

EPA Registration No.
67702-26
Vol. 1

Material to be added to an e-Jacket/Jacket

Reg. No. 67702-26

1. ☒ Placement within the e-Jacket/jacket:

☐ Default: (chronological, top/newest)

☐ Description: (PDF page number, i.e., "before page 45")

2. ☒ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☐ Notification

☐ New CSF

☒ Other: Final Printed Label

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's name: Sylvester George

Phone: 603-0688 Division: BPPD

Date: 01/05/12

Receipt for Section 3							
S:	909067	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No				
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input type="radio"/> Yes <input checked="" type="radio"/> No				
Application Type:	Miscellaneous Receipt	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No				
Company:	67702 W. NEUDORFF GMBH KG	V					
Risk Manager:	Biologicals & Pollution Prevention Division, PM Team 91						
Product #:	67702-26	Product Name:	NEUM173H CONCENTRATE				
Override#:							
Me Too Section3:		Me Too Product Name:					
Application Date:	16-Dec-2011	OPP Rec'd Date:	21-Dec-2011				
Front End Date:	21-Dec-2011	Risk Manager Send Date:	21-Dec-2011				
FFS Due Date:		Negotiated Due Date:					
OPP Target Date:							
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>				
Receipt Description:							
Final Printed label							
Form A:	<input type="checkbox"/>	Signature Date:		Form B:	<input type="checkbox"/>	Signature Date:	

Print Letter
 Enter More Information
 Tracking

Receipt Content	Des
Other	Final Printed Label

Rec'd
12-28-11
AB

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

BATCH CODE:

NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Manufactured by: W. Neudorff GmbH KG
Postfach 1209, An der Mühle 3, D-31860 Emmerthal,
Germany



NEU1173H Concentrate

Active Ingredient:	By Wt.
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS:

EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1

FIRST AID	
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all applicable directions and precautions on this label before using.

Sites: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss and algae
- Narrow-leaved plantain (*Plantago lanceolata*)
- Oxalis (*Oxalis* spp.)
- Persian Speedwell (*Veronica persica*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

For Broadcast Treatment:

Rate of Spray Solution	Rate of Concent rate	Weeds Controlled	Area Treated
2.5 ga/1000 ft ²	12.6 fl. oz/ 1000 ft ²	Rate for easy-to-control weeds: black medic (<i>Medicago lupulina</i>), slender speedwell (<i>Veronica filiformis</i>), wild geranium (<i>Geranium robertianum</i>) and moss. This rate can also be used for weed seedlings of: false dandelion (<i>Hypochoeris radicata</i>), English daisy (<i>Bellis perennis</i>), dandelion (<i>Taraxacum officinale</i>) or	25,400 ft ² /2.5 ga jug

		white clover (<i>Trifolium repens</i>).	
4.9 ga/1000 ft ²	25.2 fl. oz./ 1000 ft ²	Standard rate for control of most weed species: dandelion (<i>Taraxacum officinale</i>), English daisy (<i>Bellis perennis</i>), false dandelion (<i>Hypochaeris radicata</i>), white clover (<i>Trifolium repens</i>), bull thistle (<i>Cirsium vulgare</i>), Canada thistle (<i>Cirsium arvense</i>), common chickweed (<i>Stellaria media</i>), narrow-leaved plantain (<i>Plantago lanceolata</i>), dove's foot geranium (<i>Geranium molle</i>), oxalis (<i>Oxalis</i> spp.), lawn burweed (<i>Soliva pterosperma</i>), and algae, and for the SUPPRESSION of broad-leaved plantain (<i>Plantago major</i>)	12,700 ft ² /2.5 ga jug
9.8 ga/1000 ft ²	50 fl. oz./ 1000 ft ²	Rate for tough perennial weeds such as: creeping buttercup (<i>Ranunculus repens</i>) and broad-leaved plantain (<i>Plantago major</i>)	6340 ft ² /2.5 ga jug

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 2.5-10 gallons/1000 ft² (2.8-11.5 fluid oz./yard²), using the chart to determine how much diluted spray to use per area. Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

For Spot Treatment:

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Thoroughly spray weeds to point of runoff using any standard hand-held or backpack sprayer. Use a coarse nozzle setting to reduce drift. Repeat treatment in 3 to 4 weeks for best results.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly

seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Complies with EPA Accepted Labeling

Date: Dec. 09, 2008

Reviewer: Sylvester George

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

BATCH CODE:

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Manufactured by: W. Neudorff GmbH KG
Postfach 1209, An der Mühle 3, D-31860 Emmerthal,
Germany



NEU1173H Concentrate

Active Ingredient:	By Wt.
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 24 oz

EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1

FIRST AID

IF IN EYES

Hold eye open and rinse slowly and gently with water for 15-20 minutes.
Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Sites: Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Oxalis, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Apply this (24oz) container to 470 to 940 square feet. Apply it to 940 ft² for standard application; apply it to 470 ft² to control tough perennial weeds, such as buttercup and broad-leaved plantain. This container may be applied to up to 1875 ft² to control moss, black medic, slender speedwell, wild geranium or on weed seedlings of false dandelion, English daisy, dandelion or white clover.

Uniform coverage is important. Rinse treated areas 24 hours after application. Repeat treatment in 3 to 4 weeks for best results.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 2 times a year.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

BATCH CODE:

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Manufactured by: W. Neudorff GmbH KG
Postfach 1209, An der Mühle 3, D-31860 Emmerthal,
Germany



NEU1173H Concentrate

Active Ingredient:	By Wt.
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 24 oz

EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1

FIRST AID

IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
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Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Sites: Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Oxalis, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Apply this (24oz) container to 470 to 940 square feet. Apply it to 940 ft² for standard application; apply it to 470 ft² to control tough perennial weeds, such as buttercup and broad-leaved plantain. This container may be applied to up to 1875 ft² to control moss, black medic, slender speedwell, wild geranium or on weed seedlings of false dandelion, English daisy, dandelion or white clover.

Uniform coverage is important. Rinse treated areas 24 hours after application. Repeat treatment in 3 to 4 weeks for best results.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 2 times a year.

Material to be added to an e-Jacket/Jacket

Reg. No. 67702-26

1. ☒ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top/newest)
 - ☐ Description: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☒ Send to Data Extraction contractors this material:
- ☐ Newly stamped accepted label
 - ☐ Notification
 - ☐ New CSF
 - ☒ Other: Final Printed Label

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sylvester George

Phone: 703-603-0688 Division: BPPD

Date: 6/22/2010

Receipt for Section

S: 873695

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Miscellaneous Receipt

Billable: ☐ Yes ☒ No

Company: 67702 W. NEUDORFF GMBH KG



Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 67702-26

Product Name: NEU1173H CONCENTRATE

Override#:

Me Too

Section3:

Me Too Product

Name:

Application Date: 26-Apr-2010

OPP Rec'd Date: 30-Apr-2010

Front End Date: 30-Apr-2010

Risk Manager Send Date: 03-May-2010

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐New Ingredient: ☐

Receipt Description:

Final printed labels.

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Other

Final Printed Labels.

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

Rec'd
ACB
5/4/10



United States
Environmental Protection Agency
Washington, DC 20480

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 67702-26	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) NEU1173H Concentrate	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) W. Neudorff GmbH KG c/o Walter G. Talarek PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to 12/17/2009 Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Five (5) copies of final printed label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Walter G. Talarek	Title Authorized Agent	Telephone No. (Include Area Code) 703-759-4837
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Agent	
4. Typed Name Walter G. Talarek	5. Date April 26, 2010	

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss and algae
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part NEU1173H with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally darkening of the grass leaf blades can occur after treatment; however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.



NEU1173H Concentrate

Active Ingredient:	By Wt.
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NET CONTENTS: 800 Liters

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Complies with
EPA Accepted Labeling

Date: Dec 09, 2008

Reviewer: Sylvester George

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available.

BATCH CODE

DIRECTIONS FOR USE CONTINUED.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1
Manufactured by: W. Neudorff GmbH KG
Postfach 1209, Amder Mühle 3, D-31860 Emmerthal,
Germany

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
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- Moss and algae
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part NEU1173H with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment; however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.



NEU1173H Concentrate

Active Ingredient:	By Wt.
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NET CONTENTS: 800 Liters

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available.

BATCH CODE

DIRECTIONS FOR USE CONTINUED.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

NOTICE TO BUYER

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EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1

Manufactured by: W. Neudorff GmbH KG
Postfach 1209, Am der Mühle 3, D-31860 Emmerthal,
Germany

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss and algae
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part NEU1173H with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

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NEU1173H Concentrate

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Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients.....	73.48%
Total.....	100.00%

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CAUTION

FIRST AID	
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NET CONTENTS: 800 Liters

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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BATCH CODE

DIRECTIONS FOR USE CONTINUED.

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EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1
Manufactured by: W. Neudorff GmbH KG
Postfach 1209, Amder Mühle 3, D-31860 Emmerthal,
Germany

DIRECTIONS FOR USE

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SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

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NEU1173H Concentrate

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Other Ingredients.....	73.48%
Total.....	100.00%

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Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

NET CONTENTS: 800 Liters

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STORAGE AND DISPOSAL

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BATCH CODE

DIRECTIONS FOR USE CONTINUED.

Use Precautions:

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• EPA Reg. No. 67702-26 EPA Est. No. 67702-DEU-1
• Manufactured by: W. Neudorff GmbH KG
• Postfach 1209, Am Mühle 3, D-31860 Emmerthal, Germany



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division
(7511P)
1200 Pennsylvania Avenue NW
Washington, DC 20460

EPA Reg. Number:

67702-26

Date of Issuance:

DEC 09 2008

Unconditional

Term of Issuance:

Name of Pesticide Product:

NEU1173H Concentrate

NOTICE OF PESTICIDE:

☒ **Registration**
☐ **Reregistration**
(under FIFRA, as amended)

Name and Address of Registrant (Include ZIP Code):

**Neudorff GmbH KG
C/O Walter G. Talarek
Walter G. Talarek, P. C.
1008 Riva Ridge Drive
Great Falls, VA 2206**

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA Sec. 3(c)(5) provided you:

1. Submit and/or cite all data required for registration/ re-registration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data.
2. Revise the EPA Registration Number to read, "EPA Reg. No. **67702-26**."
3. Submit three (3) copies of the revised final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records.

Signature of Approving Official:

Michael McDavit

Michael McDavit, Associate Director,
Biopesticides and Pollution Prevention Division

Date:

12-9-08

MASTER LABEL

NEU1173H Concentrate

Active Ingredient:
Iron HEDTA (FeHEDTA)..... 26.52%
Other Ingredients:..... 73.48%
Total:..... 100.00%

SUBLABEL A: Household use on Weeds
SUBLABEL B: Household use on Weeds – Hose-end Sprayer
SUBLABEL C: Household use on Moss
SUBLABEL D: Household use on Moss – Hose-end Sprayer
SUBLABEL E: Commercial use on Weeds
SUBLABEL F: Commercial use on Weeds – Hose-end Sprayer
SUBLABEL G: Commercial use on Moss
SUBLABEL H: Commercial use on Moss – Hose-end Sprayer

EPA REG. NO. 67702-

EPA EST. 67702-WG-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
D-31860 Emmerthal, Germany
www.neudorff.com

Household Use: NET CONTENTS: 16 ounces, 24 ounces, 32 ounces, 1 gallon

Commercial Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 10 gallons,
20 gallons, 40 gallons, 45 gallons, 50 gallons, 200 gallons

ACCEPTED

DEC 09 2008

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for
the pesticide registered under
EPA Reg. No.

67702-26

NEU1173H Concentrate

Active Ingredient:	
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients:.....	73.48%
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CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

The following claims and product information, may or may not be presented on the product's label and labeling:



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use IH01 or NEU1171H – *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Can be used on new lawns (1 week) after grass emergence
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending

NEU1173H

Page 5 of 49

-Patent #6,972,273

-Makes over XX gallons

-1 ounce = 2 tablespoons = 6 teaspoons

-Kills weeds, down to the root

-Kills dandelions, down to the root

-(Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture

-(Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds

-People and pets can enter treated area when spray dries!

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

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Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

NEU1173H Concentrate

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Iron HEDTA (FeHEDTA)..... 26.52%
Other Ingredients:..... 73.48%
Total:..... 100.00%

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DIRECTIONS FOR USE

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Use Sites:

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Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium,

NEU1173H

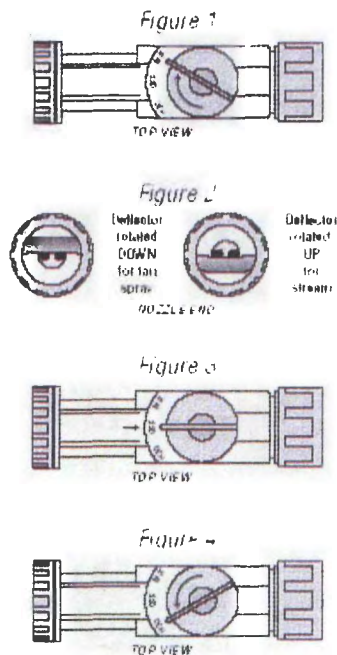
Page 7 of 49

Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss,
Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

**To Use This Sprayer:**

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

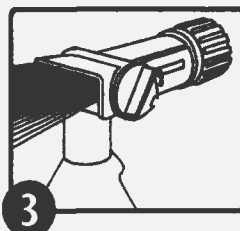
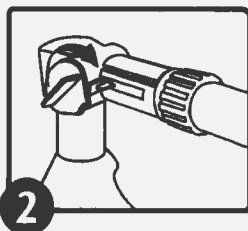
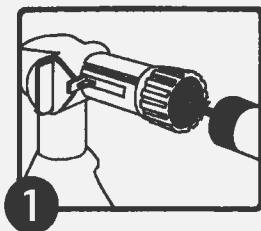
6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

OR

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray weeds thoroughly.

To Stop Spraying:

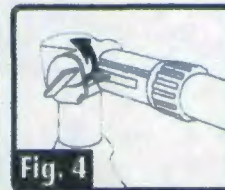
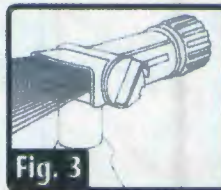
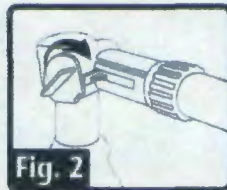
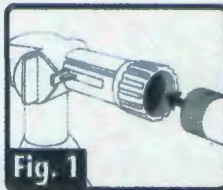
1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



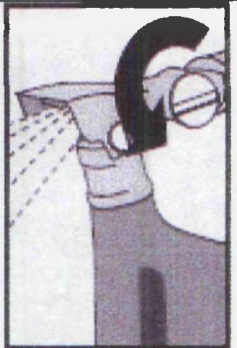


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,

- b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray weeds thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. **Avoid spraying desirable plants.** Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. **Do not apply if rainfall is expected within 3 hours of application.** Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast

NEU1173H

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- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use IH01 or NEU1171H -- *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL C – HOUSEHOLD USE ON MOSS

NEU1173H Concentrate

Active Ingredient:	
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

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Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly. Treated moss or algae will turn brown or black.

Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

(The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use IH01 or NEU1171H – *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries

[Optional warranty statements. Registrant has choice of using any or none.]

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

NEU1173H Concentrate

Active Ingredient:	
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients:.....	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	<ul style="list-style-type: none">-Hold eye open and rinse slowly and gently with water for 15-20 minutes.-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.-Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

Pests:

Controls moss, algae, lichens, and liverworts.

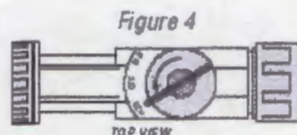
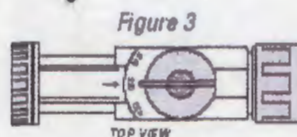
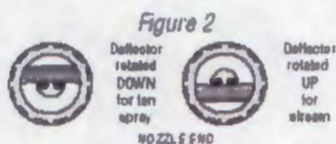
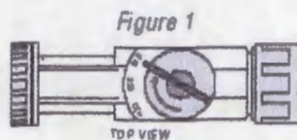
Application Directions

NEU1173H

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Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

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To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

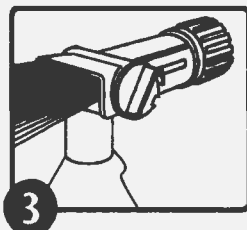
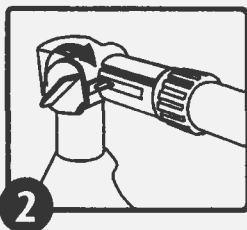
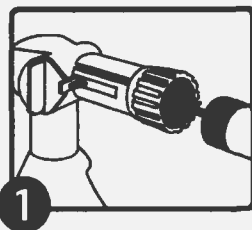
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1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray moss surfaces thoroughly.

To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

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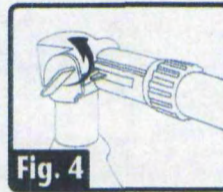
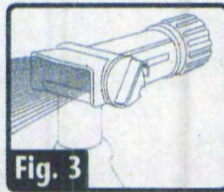
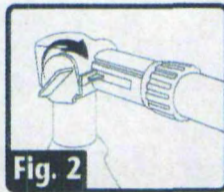
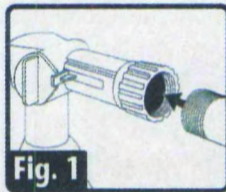
OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.

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7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR

<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

1

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. **May stain thatch** (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. **Avoid spraying desirable plants.** Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. **Do not apply if rainfall is expected within 3 hours of application.** Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

The following claims and product information, may or may not be presented on the product's label and labelling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

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-Lawn Moss Control

-Water-based

With the provided hose-end sprayer, this container will treat XXX ft²

-Works in cool weather

-Rainfast in 3 hours

-Works fast

-See results the same day

-See results in hours

-Fast and effective

-No unpleasant odor

-Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)

-Derived from iron (Fe)

-Iron (Fe) occurs in nature

-For non-selective (moss) weed and grass control, use IH01 or

NEU1171H – *insert product name*

-Eliminates unwanted moss, algae and lichens quickly

-Kills algae, moss and lichens

-Kills moss and algae

-Moss killer

-Moss, algae and lichen killer

-Kills moss fast

-Kills moss, algae, and lichens quickly and effectively

-Lawn areas can be re-sown within one day of treatment with NEU1173H

-(Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)

-One gallon of concentrate will treat up to 2500 ft² (of lawn)

-Can be used on new lawns (1 week) after grass emergence

-Even works in cool weather

-Also works in cool weather

-Patent pending

-Patent #6,972,273

-(Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture

-People and pets can enter treated area when spray dries

-Ready-To-Spray

-Hose-End Bottle

-Hose-End Sprayer

-This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to

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label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL E – COMMERCIAL USE ON WEEDS

NEU1173H Concentrate

Active Ingredient:
Iron HEDTA (FeHEDTA)..... 26.52%
Other Ingredients: 73.48%
Total:..... 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Thoroughly spray weeds. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. **Avoid spraying desirable plants.** Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day

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- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law,

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the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:	
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients:.....	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

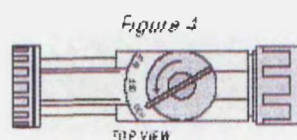
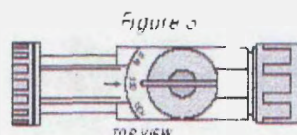
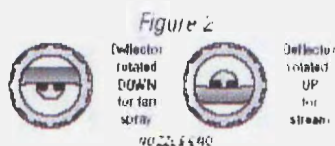
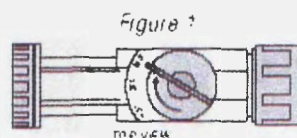
- Black medic (*Medicago lupulina*)

- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)
- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

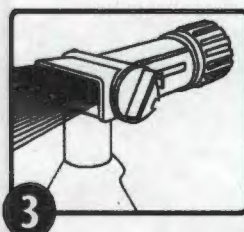
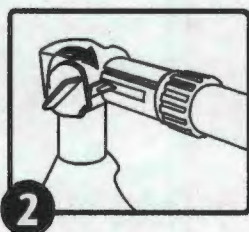
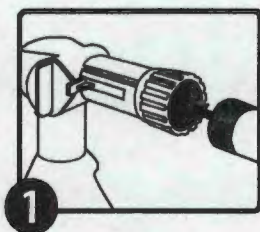
OR

1. Attach garden hose to spray nozzle. Turn on water supply.

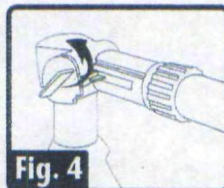
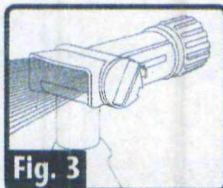
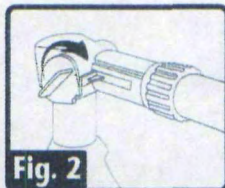
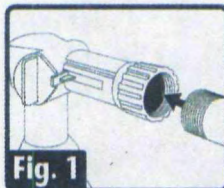
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Thoroughly spray weeds.



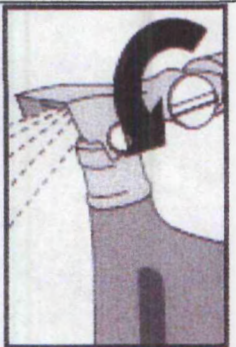
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray weeds thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours

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- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use INEU1170H or NEU1171H – *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to

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label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:
Iron HEDTA (FeHEDTA)..... 26.52%
Other Ingredients:..... 73.48%
Total:..... 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using.

Mix one part NEU1173H concentrate with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

What will I see?

Works quickly. Treated moss or algae will turn brown or black.

Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

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[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use INEU1170H or NEU1171H – *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
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- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

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-Buyer assumes all responsibility for safety and use not in accordance with directions.

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-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

SUBLABEL H – COMMERCIAL USE ON MOSS – HOSE-END SPRAYER

NEU1173H Concentrate

Active Ingredient:	
Iron HEDTA (FeHEDTA).....	26.52%
Other Ingredients:.....	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

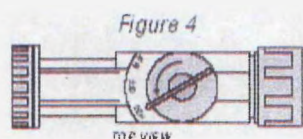
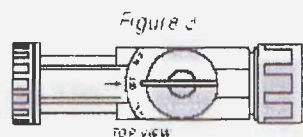
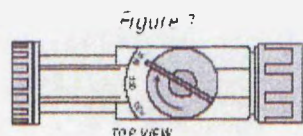
PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment if needed.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying:

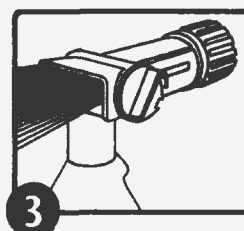
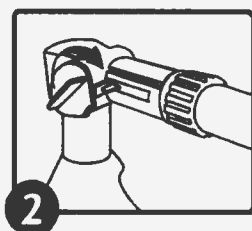
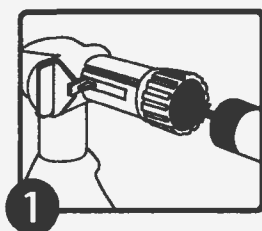
1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.

3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray moss thoroughly.

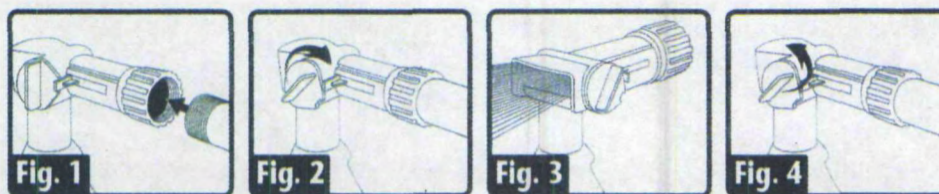
To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR

<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly. Treated moss or algae will turn brown or black.

Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. **May stain thatch** (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. **Avoid spraying desirable plants.** Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. **Do not apply if rainfall is expected within 3 hours of application.** Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based

NEU1173H

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- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use INEU1170H or NEU1171H – *insert product name*
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the

Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

MEMORANDUM

SUBJECT: Consideration of an unconditional registration of the active ingredient Iron HEDTA (PC Code 034702). This compound will be incorporated into end-use products intended to control weeds, algae and moss on non-food crops.

----- **DECISION MEMORANDUM** -----

FROM: W. Michael McDavit, Associate Director
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs

TO: Debra Edwards, Ph. D., Director
Office of Pesticide Programs

ISSUE

Should the Agency grant an unconditional registration under FIFRA § 3(c)(5) for the new biochemical active ingredient, Iron HEDTA (PC Code 034270) to be used in end-use products intended to control weeds, algae and moss on non-food crops?

APPLICANT INFORMATION

On August 17, 2007, W. Neudorff GmbH KG, submitted an application for the registration of the end use products (EP) NEU1173H Concentrate herbicide containing 26.52% w/w Iron HEDTA EPA Registration Number 67702-EA, and NEU1173H RTU, containing 1.5 w/w Iron HEDTA EPA Reg. Number 67702-ET. A notice of receipt of the application for registration of Iron HEDTA as a new active ingredient was published in the Federal Register on June 25, 2008 (73 FR 36076) with a 30-day comment period.

BACKGROUND AND CONCLUSIONS

The Biopesticides and Pollution Prevention Division (BPPD) reviewed submitted data and information regarding the proposed use of Iron HEDTA. Evaluations of the data and conclusions are summarized and discussed in the attached Biopesticide Registration Action Document (BRAD). The technical grade of the active ingredient (TGAI) Iron HEDTA and other similar chelates

CONCURRENCES

SYMBOL	7511P	7511P						
SURNAME	Bennhead	L. Horn						
DATE	12/3/08	12/3/08						

like Fe EDTA have been applied as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants.

BPPD has considered Iron HEDTA in light of relevant safety factors in the Food Quality Protection Act (FQPA) of 1996 and under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and determined there will be no unreasonable adverse effects from the use of this product. BPPD has considered available data on Iron HEDTA, including its low toxicity following oral, inhalation or dermal exposure, and extensive use as a foliar fertilizer with no reports of any adverse effects. Moreover, BPPD believes that end use products containing Iron HEDTA can be used without causing unreasonable adverse effects to humans or the environment. BPPD has concluded that this registration should be issued on a conditional basis pending submission of acceptable product performance data.

The data submitted by the applicant and reviewed by BPPD support the application to register the products NEU1173H Concentrate and NEU1173H RTU containing, respectively, 26.52% and 1.5% of the new active ingredient, Iron HEDTA, when applied / used as directed on the label and in accordance with good agricultural practices.

OFFICE DIRECTOR CONCURRENCE

Based on the discussion above and the summarized data evaluations in the attached BRAD, BPPD recommends that the products NEU1173H Concentrate and NEU1173H RTU containing, respectively, 26.52% and 1.5% of the new active ingredient, Iron HEDTA (PC Code 034270), be unconditionally registered under 3(c)(5) of FIFRA for use to control weeds, algae and moss on non-food crops.

Concurrence: RPK for DE

Non Concurrence: _____

Date: DEC - 8 2008



BIOPESTICIDES REGISTRATION ACTION DOCUMENT

Iron HEDTA

**U.S. Environmental Protection Agency
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division**

(Last updated *insert date*)

This document is for informational purposes only and is representative of the Agency's justification in registering products containing this active ingredient. This is not a legal document. (Need OGC language)

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BIOPESTICIDES REGISTRATION ACTION DOCUMENT TEAM

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I. EXECUTIVE SUMMARY:

The active ingredient Iron HEDTA is a deep red, odorless liquid compound. It is intended for use in households (residential) and on lawns, commercial right of ways, golf courses, parks and playgrounds to control weeds, algae and moss using ground equipment.

The Biopesticides and Pollution Prevention Division (BPPD) has reviewed the data required to support the registration of this biochemical active ingredient, under Section 3(c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Product chemistry data requirements were satisfied by acceptable guideline studies. Adequate mammalian toxicology data/information was submitted to support registration of Iron HEDTA. Acceptable acute toxicity guideline studies were submitted, and data waivers were granted by the Agency to fulfill the remaining toxicity requirements based on the lack of toxicity of the active ingredient. Ecological effects data requirements for Iron HEDTA were fulfilled by acceptable guideline studies and additional data/information from the scientific literature sufficient to support data waivers for the remaining Tier I and Tier II requirements.

Based on the data available to the Agency, it has been determined that no unreasonable adverse effects to the U.S. population and the environment will result from the use of the active ingredient when label instructions are followed and good agricultural practices are employed. Laboratory studies indicate that the active ingredient is not toxic following oral, inhalation or dermal exposure. Iron HEDTA and other chelates like ferric EDTA have been extensively used as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants. There are no reports of adverse effects following human exposure to Iron HEDTA. Moreover, the pesticidal usage of this biochemical will not have any harmful environmental effects. Studies indicate that Iron HEDTA will not cause adverse effects to mammals, birds, fish and aquatic invertebrates, other non-target insects, or plants.

Efficacy data submitted on the end use product were reviewed and showed support to the claims of product performance on the label.

II. ACTIVE INGREDIENT OVERVIEW

Common Name: Ferric HEDTA

Chemical Names: Iron HEDTA

Trade & Other Names: FeHEDTA

CAS Registry Number: 17084-02-5

OPP Chemical Code: 034702

Type of Pesticide: Herbicide, algaecide and mossicide.

Application rates and methods vary depending on the product. For specific information regarding the product(s) refer to Appendix B.

III. REGULATORY BACKGROUND

On August 17, 2007, W. Neudorff GmbH KG, submitted an application for the registration of the end use products (EP) NEU1173H Concentrate herbicide containing 26.52% w/w Iron HEDTA EPA Registration Number 67702-EA, and NEU1173H RTU, containing 1.5 w/w Iron HEDTA EPA Reg. Number 67702-ET. A notice of receipt of the application for registration of Iron HEDTA as a new active ingredient was published in the Federal Register on June 25, 2008 (73 FR 36076) with a 30-day comment period. No comments were received following this publication.

A. Classification

On April 02, 2001, the Biochemical Classification Committee determined that Iron HEDTA is not a biochemical pesticide, but is nonetheless eligible for treatment like a biochemical pesticide (see data requirements at 40 CFR Subpart U). Iron HEDTA has no direct lethal effects on the target pest, and appears to operate as oxidative agent on target pests.

B. Food Clearances/Tolerances

Currently, this active ingredient is not registered for use on food or feed commodities, and the applicant has not filed a petition for a tolerance (nor a tolerance exemption) for Iron HEDTA. As a result, a tolerance or exemption from the requirement of a tolerance is not relevant.

IV. RISK ASSESSMENT

A. Active Ingredient Characterization

Iron is a ubiquitous inorganic element in the environment. Iron HEDTA and other similar chelates like Fe EDTA have been applied as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants.

The descriptions of the product formulation and production process, as well as the formation of impurities, were examined by the Agency and found to be acceptable in meeting current guideline standards. A preliminary analysis was conducted to determine Iron HEDTA content in five batches of the product, and the results were determined to be acceptable by the Agency. The analytical method used to determine the content of the active ingredient is also acceptable. Physical and chemical properties were submitted for the active ingredient and are adequate. Refer to Table 1 in Appendix A for a summary of product chemistry data requirements. Refer to Table 2 in Appendix A for the summary of physical and chemical characteristics for Iron HEDTA. All product chemistry data requirements for registration of Iron HEDTA have been **satisfied**.

B. Human Health Assessment

1. Toxicology

Toxicity categories are assigned based on the hazard(s) identified from studies and/or information on file with the Agency. The active ingredient is classified into Toxicity Category I, II, III or IV where Toxicity Category I indicates the highest toxicity and Toxicity Category IV indicates the lowest toxicity.

Adequate mammalian toxicology data/information on the technical grade active ingredient (TGAI) are available to support registration of Iron HEDTA. All toxicology data requirements have been **satisfied**.

a. Acute Toxicity

Acute toxicity testing is required to 1) determine systemic toxicity from acute exposure via the dermal, inhalation and oral routes, 2) determine irritant effects from exposure to the eyes and 3) determine the potential for skin sensitization (allergic contact dermatitis).

The substance used in the toxicity studies was the TGAI/EP containing 26.52% Iron HEDTA. The substance is in Toxicity Category IV for acute oral, acute dermal, acute inhalation toxicity, and eye and dermal irritations. The substance is not a dermal sensitizer. Based on the review and analysis of the guideline studies, no additional toxicity data are required to support non-food uses of this biochemical.

For more information regarding the acute toxicity data requirements, refer to Table 3 in Appendix A.

b. Sub-chronic Toxicity

Sub-chronic data is required to determine a no-observed-effect-level (NOEL) and toxic effects (if any) associated with repeated or continuous exposure to a test substance for a period of 90 days.

The Agency received and accepted the registrant's waiver requests for 90-day Feeding Study (OPPTS 870.3100); 90-Day Dermal Study (OPPTS 870.3250); 90-Day Inhalation Study (OPPTS 870.3465); and Immune Response (OPPTS 880.3550).

The data requirement for 90-day Feeding Study (OPPTS 870.3100) is not applicable because the product will not be used on food commodities, and no repeated sub-chronic oral exposures are expected. Moreover, Tier I acute toxicity studies show toxicity category IV for all routes of exposure.

The waiver rational for a 90-Day Dermal Toxicity Study (OPPTS 870.3250) was accepted because the product is not likely to result in prolonged skin exposure. Furthermore, iron is found abundantly in nature, and has low toxicity because of its low absorption through skin.

The 90-Day Inhalation Toxicity Study (OPPTS 870.3465) waiver request was accepted because the use pattern of the product is not expected result in repeated inhalation exposure at a concentration which is likely to be toxic.

c. Developmental Toxicity and Mutagenicity

Acceptable waiver request was submitted to address the data requirements for Developmental toxicity and Mutagenicity (OPPTS 870.3700). The Agency concluded that human's are regularly exposed to iron found abundantly in nature and from the use of iron cheats as fertilizers. No negative effects of Iron HEDTA have been reported because of its low toxicity, and low water solubility, which would decrease its absorption across the intestine. Moreover, the active ingredient is not a mutagen nor is it related to any known classes of mutagens

e. Effects on the Endocrine System

EPA is required under the Federal Food, Drug, and Cosmetics Act (FFDCA), as amended by the Food Quality Protection Act (FQPA), to develop a screening program to determine whether certain substances (including all pesticide active and other ingredients) "may have an effect in humans that is similar to an effect produced by a naturally-occurring estrogen, or other such endocrine effects as the Administrator may designate." Following the recommendations of its Endocrine Disruptor Screening and Testing Advisory Committee (EDSTAC), EPA determined that there was scientific basis for including, as part of the program, the androgen and thyroid hormone systems, in addition to the estrogen hormone system. EPA also adopted EDSTAC's recommendation that the program include evaluations of potential effects in wildlife. For pesticide chemicals, the Agency will use FIFRA and, to the extent that effects in wildlife may help determine whether a substance may have an effect in humans, FFDCA authority to require the wildlife evaluations. As the science develops and resources allow, screening of additional hormone systems may be added to the Endocrine Disruptor Screening Program (EDSP).

The Agency is not requiring information on the endocrine effects of Iron HEDTA at this time. The Agency has considered, among other relevant factors, available information concerning whether the active ingredient may have an effect on humans similar to an effect produced by naturally-occurring estrogen or other endocrine effects. There is no known metabolite that acts as an endocrine disrupter produced by this active ingredient. Based on the low potential exposure level associated with the proposed use, the Agency expects no incremental adverse effects to the endocrine or immune systems.

2. Dose Response Assessment

No toxicological endpoints were identified; therefore, a dose response assessment was not required.

3. Drinking Water Exposure and Risk Characterization

No significant drinking water exposure is expected from accumulation of Iron HEDTA in the aquatic environment when products containing the active ingredient are used according to label directions. Moreover, Iron HEDTA degrades readily in the environment.

4. Occupational, Residential, School and Day Care Exposure and Risk Characterization

a. Occupational Exposure and Risk Characterization

The potential for dermal, eye, and inhalation exposure to Iron HEDTA for handlers and applicators is mitigated as long as products are used according to label directions. The Agency will require labels to include the appropriate signal word and precautionary statements, including the requirement for personal protective equipment, to mitigate any risk of exposure.

b. Residential, School and Day Care Exposure and Risk Characterization

No indoor residential, school, or day care uses are currently approved for products containing Iron HEDTA.

5. Risk Characterization

The Agency considered human exposure to Iron HEDTA in light of the relevant safety factors in FQPA and FIFRA. A determination has been made that no unreasonable adverse effects to the U.S. population in general, and to infants and children in particular, will result from the use of Iron HEDTA when label instructions are followed.

C. ENVIRONMENTAL ASSESSMENT

1. Ecological Hazards

Adequate non-target toxicology data/information are available to support registration of Iron HEDTA. All non-target toxicology data requirements for Iron HEDTA have been **satisfied**.

Iron HEDTA and other similar chelates have been applied as liquid fertilizers in soil and foliar applications for many years to address the micronutrient deficiencies in plants. No reports of negatives effects have been documented for the use of these chelates.

According to an avian acute oral toxicity study, Iron HEDTA is considered to be practically non-toxic to birds via the oral route of exposure ($LD_{50} > 2000$). Iron HEDTA is considered to be practically non-toxic to freshwater fish based on a freshwater fish toxicity study (96-hour $LC_{50} > 100$ mg/L). It is also no-toxic to freshwater invertebrate (48-hour $LC_{50} > 100$ mg/L).

Non-target insect studies submitted showed that Iron HEDTA has no toxic effect on honey bee (Oral 83.7 μ g a.i./bee; Contact: 48 hr > 10 μ g a.i./bee).

For more information regarding the non-target toxicity data requirements, refer to Table 4 in Appendix A.

2. Environmental Fate and Ground Water Data

Iron HEDTA is chemically similar to ferric EDTA and thus the two chelates follow the same pathways of degradation, photodegradation and microbial degradation in waste water, sediments and soils. According to Sykora et al. (2001) biological degradation of ethylenediamine-based complexing agents decreases in order of the following substitutes: $-\text{COOH}_3$, $-\text{CH}_3$, $-\text{C}_2\text{H}_5$, $-\text{CH}_2\text{CH}_2\text{OH}$ and $-\text{CH}_2\text{COOH}$ suggesting that HEDTA may be more susceptible to degradation than EDTA. Ferric complexes of EDTA, HEDTA and DTPA are decomposed on exposure to daylight (Hill-Cottingham, 1995). The half-life of ferric EDTA is calculated between 11.3 min to more than 100 h for surface waters containing Fe(III)EDTA (Frank and Rau, 1989; Kari et al, 1995; Svenson et al., 1989). The differences observed in the half-life rates are likely due to differences in light conditions of the experiments. The wavelength of light that is required to photodegrade Fe(III)EDTA is the fraction of sunlight below 400 nm (i.e. in the UV range) (Bucheli-Witschel and Egli, 2001). The rate of photodegradation is also dependent on pH but at measured pH 4 and 8, Fe(III)EDTA was completely degraded in 24 and 32 hours (Lockhart, 1975). Ferric EDTA degrades to ED3A, EDDA-N,N', EDDA-N,N, EDMA, IMDA, glycine and formaldehyde all of which are biodegradable (Metsarinne, 2001). Microbial degradation of ferric EDTA has been documented in numerous studies. In a mixed culture of microorganisms (genus *Methylobacterium*, *Variovarax*, *Enterobacter*, *Aureobacterium* and *Bacillus*) 60% of Fe(III)EDTA was degraded (Bucheli-Witschel, 2001). Ninety percent degradation of ferric EDTA was achieved with a pure culture of *Agrobacterium* sp. (Lauff, 1990). Ferric EDTA was microbially degraded in naturally occurring soils and sediments (Tiedje, 1975 and 1977). Likewise, ferric EDTA was degraded in mixed microbial populations collected from an aerated lagoon (Belly, 1974).

3. Ecological Exposure and Risk Characterization

The potential for exposure to non-target wildlife is minimal. Based on the results/information presented in the Environmental Fate and Groundwater Data section above, it is highly unlikely that non-target organisms, particularly aquatic organisms, would be exposed to potentially toxic levels of Iron HEDTA via runoff and/or movement through the soil. Iron HEDTA undergoes rapid biodegradation in soil and water, and no unreasonable adverse effects to the environment are expected from the use of Iron HEDTA when label instructions are followed.

4. Endangered Species Assessment

Due to chemical similarity between Iron HEDTA and Ferric EDTA, the biological effects of these chelates are comparable. Available information on the effects of iron in sodium ferric EDTA on non-target organisms indicates that the iron in these chelates interacts with the hemocyanin in the bloodstream of molluscs and crustaceans, and it would be toxic to mollusks and crustaceans. However, exposure to freshwater crustaceans or mollusks is unlikely to occur given the intended use of this product as herbicide applied directly to terrestrial plants.

Exposure to endangered or threatened terrestrial snails and crustaceans (isopods) is not expected since the currently listed endangered or threatened species pursuant to the Endangered Species Act of 1973, 16 U.S.C. 1531, et seq., are not found in locations where the product is intended for

use; i.e., home lawns, rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. The habitats of currently listed as threatened or endangered mollusks and crustacean species range from isolated caves and streams to woods or forests.

D. PRODUCT PERFORMANCE DATA (EFFICACY)

Submission of product performance data (OPPTS 810.3000) is listed as a requirement for all pesticide products. Customarily, the Agency requires efficacy data to be submitted for review only in connection with the registration of products directly pertaining to the mitigation of disease bearing human health organisms and certain designated quarantine pests, i.e., ticks, mosquitoes, fleas, Mediterranean fruit flies, gypsy moths, Japanese beetles, etc. For a list of organisms considered by the Agency as "public health pests", please refer to Pesticide Registration Notice 2002-1 (http://www.epa.gov/PR_Notices/pr2002-1.pdf).

A series of greenhouse and field trials were conducted to evaluate the efficacy of NEU1173H (a.i., 26.52% w/w Iron HEDTA) against a variety of weeds including dandelion, white clover, English daisy, creeping buttercup, black medick, chickweed, and moss. When applied at the label-recommended rate, the test material was effective against the tested weeds, and its efficacy increased when a second application was made 14 to 28 days after the first one. Lower application rates were less effective. Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period."

EPA calculates the application rate used in Test 1 (430 mL/m², calculated to be 460 al/A) slightly exceeds the label recommended rate (5-10 gal/1000 ft², calculated to be 218 – 436 gal/A) for the handheld sprayer used in the test. The application rates in Tests 2 – 17 (200 or 400 mL/m²) are slightly below the recommended rate. In Tests 18 and 19, the reviewer calculates the application rates of 8.9, 17.7, and 26.6 mL/m² to be 9.5, 18.9, and 28.4 gal/A, respectively. The 18.9 gal/A rate slightly exceeds, and the 28.4 gal/A rate greatly exceeds, the label recommended rate of 1 gal/2500 ft² (calculated to be 17 gal/A) for the hose-end sprayers used in the test. Therefore the results for the 26.6 mL/m² rate should be discounted. When used at the recommended application rate, the test material was effective against a variety of weeds, and its efficacy increased when a second application was made (Tests 1, 2, 5, 12, and 19). The product label recommends a second application after three to four weeks. The second application in Tests 1, 2, and 5 was made after two weeks, and in Tests 12 and 19 after about four weeks. Phytotoxicity to grasses was normally minimal (<5%), although it reached 20% in one test. However, by the end of the test the grass had recovered. The application rates and re-application times do not coincide with those recommended on the label. In most cases, the study demonstrates the performance of the product

V. Risk Management Decision

A. Determination of Eligibility for Registration

Section 3(c)(5) of FIFRA provides for the registration of new active ingredients if it is determined that (A) its composition is such as to warrant the proposed claims for it; (B) its labeling and other materials required to be submitted comply with the requirements of FIFRA; (C) it will perform its intended function without unreasonable adverse effects on the

environment; and (D) when used in accordance with widespread and commonly recognized practice it will not generally cause unreasonable adverse effects on the environment.

The four criteria of the Eligibility Determination for Pesticidal Active Ingredients are satisfied by the science assessments supporting products containing Iron HEDTA. Such products are not expected to cause unreasonable adverse effects, and are likely to provide protection as claimed when used according to label instructions. Therefore, Iron HEDTA is eligible for registration for the labeled uses.

B. Regulatory Decision

The data submitted fulfill the requirements of registration for use in households (residential) and on lawns, commercial right of ways, golf courses, parks and playgrounds to control weeds, algae and moss using ground equipment. Refer to Appendix B for product-specific information.

1. Conditional/Unconditional Registration

All data requirements are fulfilled and EPA has determined that unconditional registration of Iron HEDTA is appropriate.

C. Environmental Justice

EPA seeks to achieve environmental justice, the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, in the development, implementation, and enforcement of environmental laws, regulations, and policies. To help address potential environmental justice issues, the Agency seeks information on any groups or segments of the population who, as a result of their location, cultural practices, or other factors, may have atypical, unusually high exposure to Iron HEDTA, compared to the general population. Please comment if you are aware of any sub-populations that may have atypical, unusually high exposure compared to the general population.

VI. ACTIONS REQUIRED BY REGISTRANTS

The Agency evaluated all of the data submitted in connection with the initial registration of Iron HEDTA and determined that these data are sufficient to satisfy current registration data requirements. No additional data are required to be submitted to the Agency at this time. For new uses and/or changes to existing uses, additional data may be required.

Notwithstanding the information stated in the previous paragraph, it should be clearly understood that certain, specific, data are required to be reported to the Agency as a requirement for maintaining the Federal registration for a pesticide product. A brief summary of these types of data are listed below.

A. Reporting of Adverse Effects

Reports of all incidents of adverse effects to the environment must be submitted to the Agency under the provisions stated in FIFRA, Section 6(a)(2).

B. Reporting of Hypersensitivity Incidents

Additionally, all incidents of hypersensitivity (including both suspected and confirmed incidents) must be reported to the Agency under the provisions of 40 CFR Part 158.2050(d).

VII. Appendix A. Data Requirements (40 CFR Part 158-Subpart U)

*NOTE: MRID numbers listed in the following tables are representative of supporting data for the original registration of the product containing this active ingredient. Subsequent to this registration, there may be additional MRIDs that support registration of other products containing this active ingredient.

TABLE 1. Product Chemistry Data Requirements for <i>Active Ingredient</i> (40 CFR § 158.2030)		
OPPTS Guideline No.	Study (MRID 475387-01)	Results
830.1550 to 830.1670	Product identity; Manufacturing process; Discussion of formation of unintentional ingredients	Submitted data satisfy the requirements for product identity, manufacturing process, and discussion of formation of impurities.
830.1700	Analysis of samples	Submitted data satisfy the requirements for analysis of samples.
830.1750	Certification of limits	Limits listed in the CSF are adequate / acceptable.
830.1800	Analytical method	Acceptable.

TABLE 2. Physical and Chemical Properties of <i>Active Ingredient</i> (40 CFR § 158.2030) MRID 475387-01, 02		
OPPTS Guideline No.	Property	Description of Result
830.6302	Color	Deep red
830.6303	Physical State	Liquid at room temperature
830.6304	Odor	Odorless
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	Not required for EP
830.6315	Flammability	Not applicable. The product does not contain any combustible ingredients
830.6317	Storage Stability	No change in Iron HEDTA content when stored for a month at 50 degree C
830.6319	Miscibility	Not applicable, the product is not to be mixed with petroleum solvents. Miscible with water in all proportions
830.6320	Corrosion Characteristics	No evidence of corrosive effects on HDPE bottles or caps after one month of storage at 50°C.
830.7000	pH	6.50 ± 0.50
830.7050	UV/Visible Light Absorption	Not required for EP.
830.7100	Viscosity	6 cPs at 30 rpm 11.5 cPs at 60 rpm 4 cPs at 30 rpm Measured with spindle LV1 after one minute at 20°C
830.7200	Melting Point/Range	Not applicable, product is a liquid.
830.7220	Boiling Point/Range	Not required for EP
830.7300	Density	Density is 1.29 g/mL at 20°C
830.7520	Particle Size, Fiber Length and Diameter Distribution	Not applicable, product is a liquid.
830.7550 830.7560 830.7570	Partition Coefficient (n- Octanol/Water)	Not required for EP.
830.7840	Water Solubility	Not required for EP.
830.7950	Vapor Pressure	Not required for EP.

Table 3. Human Toxicology Data Requirements for Iron HEDTA (40 CFR § 158.2050)

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	> 5000 mg/kg	IV	472074-04
Acute Dermal Toxicity/OPPTS 870.1200	> 5000 mg/kg	IV	472074-05
Acute Inhalation Toxicity/OPPTS 870.1300	> 5.43 mg/L	IV	472074-06
Acute Eye Irritation/OPPTS 870.2400	Mildly irritating	IV	472074-07
Acute Dermal Irritation/OPPTS 870.2500	Non-irritating	IV	472074-08
Skin Sensitization/OPPTS 870.2600	Not skin sensitizer	IV	472074-09

TABLE 4. Non-Target Organism Toxicity Requirements for active ingredient (40 CFR § 158.2060)

<u>Study/OPPTS Guideline No.</u>	<u>Results (LD₅₀/LC₅₀)</u>	<u>Toxicity Category/Description</u>
Avian acute oral toxicity <i>Colinus virginianus</i> (850.2100)	>2000 mg/kg bw	Practically non-toxic (MRID 47207410)
Avian dietary toxicity <i>Colinus virginianus</i> (850.2200)	> 5000 ppm	Practically non-toxic (MRID 47233001)
Aquatic invertebrate acute toxicity (<i>Daphnia magna</i>) (850.1010)	48 hr > 100 mg/L	Practically non-toxic (MRID 47233003)
Freshwater fish LC ₅₀ (<i>Oncorhynchus mykiss</i>) (850.1075)	96 hours > 100 mg / L	Practically non-toxic (MRID 47233002)
Non-target insects Honey bee acute and contact toxicity LD 50 (880.3020)	Oral: 83.7 µg a.i./bee Contact: 48 hr > 100 µg a.i./bee	Toxic Practically no-toxic (MRID 47233004)

VIII. Appendix B.

For product specific information, please refer to...add in link.

IX. Appendix C.

REFERENCES

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Lauff, J.J. et al. 1990. Degradation of the ferric chelate of EDTA by a pure culture of an *Agrobacterium* sp. *Appl. Env. Micro.* Vol 56, No. 11, p. 3346-3353.

Lockhart, H.B. Jr. and R.V. Blakeley. 1975. Aerobic photodegradation of Fe(III)-ethylenedinitrilotetraacetate (ferric EDTA). *Env. Sci. Technol.* 9:1035-1038.

Metsarinne, S., T. Tuhkanen, R. Aksela. 2001. Photodegradation of ethylenediaminetetraacetic acid (EDTA) and ethylenediamine dissuccinic acid (EDDS) within natural UV radiation range. *Chemosphere*, 45: 949-955.

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Sykora, V., P. Pitter, I. Bittnerova and T. Lederer. 2001. Biodegradability of ethylenediamine-based complexing agents. *Wat. Res.* 35:2010-2016.

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Tiedje, J.M. 1977. Influence of environmental parameters on EDTA biodegradation in soils and sediments. *J. Env. Qual.* Vol. 6, No. 1, 21-26.

Include link to Scientific Term Glossary



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

NOV 05 2008

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

DATE: Nov. 5, 2008

SUBJECT: Science review of mammalian toxicity data requirements for registration of NEU1173H RTU, containing 1.50 % Ferric HEDTA, a new active ingredient

Decision Number:	382588
Submission Number:	836085
EPA File Symbol Number:	67702-EA
Chemical Class:	conventional chemical (metal chelate)
PC Code:	034702
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Number:	None.

FROM: Clara Fuentes, Biologist 
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

~~**THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION**~~

ACTION REQUESTED

The registrant is requesting product specific toxicity data waivers by bridging to acute toxicity studies conducted on a substantially similar concentrated product, NEU1173H (EPA Reg. No. 67702-ET), containing a higher concentration, 26.52% w/w of Iron HEDTA. Specific rationale is also provided in support of sub-chronic toxicity data waiver request.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

NOV 07 2008

DATE: Nov. 5, 2008

SUBJECT: Science review of mammalian toxicity data requirements for registration of NEU1173H RTU, containing 1.50 % Ferric HEDTA, a new active ingredient

Decision Number:	382588
Submission Number:	836085
EPA File Symbol Number:	67702-E
Chemical Class:	conventional chemical (metal chelate)
PC Code:	034702
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Number:	None.

FROM: Clara Fuentes, Biologist. 
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

~~**THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION**~~

ACTION REQUESTED

The registrant is requesting product specific toxicity data waivers by bridging to acute toxicity studies conducted on a substantially similar concentrated product, containing a higher concentration, 26.52% w/w of Iron HEDTA. Specific rationale is also provided in support of sub-chronic toxicity data waiver request.

Note to RAL: The sub-chronic toxicity data are not required for registration of the proposed end-use product. These data are required for registration of the technical active ingredient contained in the proposed end-use product.

CONCLUSIONS AND RECOMMENDATIONS

The registrant has adequately addressed all the mammalian toxicity data requirements for registration of the proposed product.

STUDY SUMMARY

Toxicity

Table 1. Acute mammalian toxicity data from substantially similar product, NEU1173H Concentrate herbicide, containing 26.52% w/w iron HEDTA (EPA Reg. 67702-ET).

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	> 5000 mg/kg	IV	472074-04
Acute Dermal Toxicity/OPPTS 870.1200	> 5000 mg/kg	IV	472074-05
Acute Inhalation Toxicity/OPPTS 870.1300	> 5.43 mg/L	IV	472074-06
Acute Eye Irritation/OPPTS 870.2400	Mildly irritating	IV	472074-07
Acute Dermal Irritation/OPPTS 870.2500	Non-irritating	IV	472074-08
Skin Sensitization/OPPTS 870.2600	Not skin sensitizer	IV	472074-09

The registrant is requesting sub-chronic toxicity data waivers based on the following rationale:

90-day oral toxicity (OPPTS 870.3100). The data requirement is not applicable because the product is non-food use, and a tolerance exemption is not required. Use of the product is unlikely to result in repeated human exposure by the oral route. Moreover, Tier I acute toxicity studies show toxicity category IV for all routes of exposure.

90-day dermal toxicity (OPPTS 870.3250). The product is not likely to result in prolonged skin exposure. Furthermore, iron is found abundantly in nature, has low toxicity, and low water solubility, which would decrease its absorption across the intestine.

90-day inhalation toxicity (OPPTS 870.3465). Use of the product will not result in repeated inhalation exposure at a concentration which is likely to be toxic.

Prenatal developmental toxicity (OPPTS 870.3700). Use of the product will not result in significant exposure to women. The product is non-food use; iron is found abundantly in

nature, has low toxicity, and low water solubility, which would decrease its absorption across the intestine.

Genotoxicity (Guideline 152-17). Use of the product will not result in significant human exposure. The active ingredient is not structurally related to a known human mutagen.

Immune response (Guideline 152-18). There is no known metabolite of ferric HEDTA that acts as an endocrine disruptor or immunotoxicant.

cc: Clara Fuentes, D. Benmhend, BPPD Chron File, IHAD/ARS.
N. Simeonova, FT, PY-S; 10/15/2008.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: October 15, 2008

SUBJECT: Evaluation of the second response to deficiency letter in support of application for registration of NEU1173H RTU, containing 1.5 % Ferric HEDTA, a new active ingredient.

Decision Number:	382588
Submission Number:	836085
EPA File Symbol Number:	67702-ET
Chemical Class:	conventional chemical (metal chelate)
PC Code:	034702
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Number:	475387-01

FROM: Nina Simeonova, Chemist, NOWCC - SEE *N. Simeonova*
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

In response to the request for additional information discussed in a memorandum from N. Simeonova to D. Benmhend dated July 24, 2008 and relayed in a letter from BPPD to the registrant dated August 8, 2008 the authorized agent W. Talarek submitted on behalf of Neudorff GmbH KG two cover letters dated September 12 and September 16, 2008 and the study 475387-01. The resubmission is in support of application for registration of NEU1173H RTU, EPA File Symbol 67702-ET, herbicide for commercial and residential areas.

CONCLUSIONS AND RECOMMENDATIONS

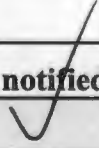

1. The applicant responded to the Agency request to conduct the test for Chemical Incompatibility. The results are submitted in MRID 475387-01. The resolution of the deficiency is acceptable.
2. The draft basic CSF dated 08/10/2007 is acceptable provided CAS # for [REDACTED] is added.

STUDY SUMMARY

MRID 475387-01. NEU1173H RTU. Product Chemistry. Physical and Chemical Characteristics. The study is conducted in compliance with GLP and does not contain CBI. It contains description of the method and the results from the testing of Chemical Incompatibility of NEU1173H RTU according to OPPTS Guideline 830.6314. NEU1173H RTU is compatible with the test reagents Water, 10% Monoammonium Phosphate, Iron Powder, 10% Potassium Permanganate and Kerosene.

cc: N. Simeonova, D. Benmhend, BPPD Chron File, IHAD/ARS.
N. Simeonova, FT, PY-S; 10/15/2008.

**Recommendation of Division Directors
Negotiated Due Dates**

Decision#: 382585	Registration#: 67702-EA	Petition #: N/A
Fee Category: B60		PRIA Decision Time Frame: 12 months
Submitted by: Driss Benmhend	Branch: BPB	Date: September 17, 2008
Company: Neudorff GmbH KG.		
Original Due Date: August 30, 2008		Proposed New Due Date: December 15, 2008
Previous Negotiated Due Dates: October 30, 2008		
Is the "Fix" in-house? Yes		If not, date "Fix" expected
Issue (describe in detail): BPPD reviews identified deficiencies relating to product chemistry, effect on non-target plants and environmental fate issues. A deficiency letter was mailed to the applicant on August 08, 2008.		
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u>D</u> Non-target effects: <u>D</u> Labeling: <u> </u> Other (describe): <u>D</u>		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant was notified on August 8, 2008 that the review of the recent data submitted did not address all the deficiencies listed in BPPD's letter dated May 23, 2008. Upon receipt of the second deficiency letter, the registrant notified BPPD that he will address the deficiencies and send a revised submission by Mid-September, 2008. He was also extremely cooperative over the fact the PRIA due date will have to be renegotiated. On September 16, 2008, the registrant sent an e-mail with new PRIA due date of December 15, 2008.		
"75 Day" Letter sent? <u> </u> Yes <u> </u> (Date sent) August 08, 2008 <u> </u> No and reason for none?		
Rationale for Proposed Due Date: BPPD will need about 3 months to complete the review and make regulatory decision for this B 60 action.		
Registrant notified that this is the last negotiation? <u> </u> Yes <u>X</u> Not Applicable		
Approve: 		Disapprove:
If disapproved, action to be taken:		
OD or DOD Signature: 		Date: 9-22-08

Checklist for Renegotiation Approval Process

Registration Package

- (✓) 2 copies of current form; Succinctly answer all questions, especially:
 - (1) is fix in?
 - (2) if not, when will fix come in?
 - (3) category of deficiency (i.e., 86-5, product chemistry)
- (✓) 1 copy of e-mail or letter from Registrant/Consultant accepting new proposed date
- (✓) Separate folder and forms for each decision number being renegotiated

Re-negotiation Approval Process

- (✓) Place completed form in renegotiation box in Division Director's office
- () Form to Doris Mack for log-in and routing to Marty Monell
- (✓) Form BPPD box then return form to Janet Andersen or Diana Hudson

BPPD Processing Procedures

- (✓) Make date change in OPPIN and returned package to RAL
- (✓) Inform Todd Peterson by email of due date change and cc: to appropriate Branch Chief
- (✓) Copy to Diana Hudson
- (✓) Original to RAL
- () RAL sends email with new data to applicant
- () RAL puts original form and copies of all relevant emails in the Jacket



Walter Talarek <wtalarek@verizon.net>

09/16/2008 03:22 PM

Please respond to
wtalarek@verizon.net

To Driss Benmhend/DC/USEPA/US@EPA

cc

bcc

Subject Re: NEU1173H and NEU1173H RTU

Hello Driss,

A PRIA due date of December 15, 2008, is acceptable to Neudorff. Please change the due date accordingly. The EPA File Symbols for these action: 67702-ET.

Sincerely,

Walt Talarek
Authorized Agent
W. Neudorff GmbH KG
703-759-4837

--- On Tue, 9/16/08, Benmhend.Driss@epamail.epa.gov <Benmhend.Driss@epamail.epa.gov> wrote:

From: Benmhend.Driss@epamail.epa.gov <Benmhend.Driss@epamail.epa.gov>

Subject: Re: NEU1173H and NEU1173H RTU

To: wtalarek@verizon.net

Cc: "cameron wilson" <cam@neudorff.ca>, "catherine stewart" <catherine@ecocare.bc.ca>, "diana parker" <diana@ecocare.bc.ca>, hollis.linda@

Date: Tuesday, September 16, 2008, 10:22 AM

Hello Walt:

As I told you this morning, the Front end Processing is in receipt of your re-submission in response to BPPD's deficiency letter dated August 8, 2008. We can now start the process of renegotiating the PRIA due date. Please send me an e-mail requesting to change the due for this B60 action to December 15, 2008.

Thanks

The need for 30 days is based on Neudorff contracting with Product Safety Labs (PSL) in Dayton, NJ to conduct oxidation/reduction studies, OPPTS 830.6314, on its two products, and PSL's assurance that final reports for these studies will be available within this timeframe.

Please contact me at your earliest convenience to discuss a new PRIA due date.

Thank you.

Walt Talarek

Authorized Agent

W. Neudorff GmbH KG

703-759-4837

Regards
Driss

Driss Benmhend

Biopesticides and Pollution Prevention Division (7511P)

Office of Pesticide Programs

The United States Environmental Protection Agency

1200 Pennsylvania Avenue. N.W.

Washington, DC 20460

(703) 308-9525

Benmhend.driss@epa.gov

www.epa.gov/oppbppd1/biopesticides/

Walter Talarek
<wtalarek@verizon.net>

08/18/2008 04:37
PM

Please respond
to
wtalarek@verizon.net

To
Driss Benmhend/DC/USEPA/US@EPA
CC
Linda Hollis/DC/USEPA/US@EPA,
cameron wilson <cam@neudorff.ca>,
diana parker
<diana@ecocare.bc.ca>, catherine
stewart <catherine@ecocare.bc.ca>
Subject
NEU1173H and NEU1173H RTU

Dear Driss,

I have received Linda Hollis' letter of August 8, 2008, concerning issues that must be resolved before EPA can proceed with its review of W. Neudorff GmbH KG's applications for registration of NEU1173H and NEU1173H RTU, EPA File Symbols 67702-EA and 67702-ET. In response, Neudorff will need thirty (30) days in which to respond to the identified issues. Therefore, Neudorff would like to discuss with you the establishment of a new PRIA date based on this 30-day period.

AUG 08 2008

Walter G. Talarek
Regulatory Consultant for Neudorff GmbH KG
Walter G. Talarek, P. C.
1008 Riva Ridge Drive
Great Falls, VA 22066

Subject: Application to Register the Products NEU1173H and NEU1173H RTU
EPA File Symbol: 67702-EA and ET
Application dated: August 15, 2007

Dear Mr. Talarek

The Biopesticides and Pollution Prevention Division (BPPD) has reviewed the data received in response to the deficiency letter dated May 23, 2008, submitted in connection with the registration under FIFRA section 3(c)(5), of the application referred to above. BPPB has concluded your recent information **did not** resolve all the discrepancies listed in BPPD's recent deficiency letter. The following issues **must** be resolved before we can proceed with the review of your submission and issue the registration for these products.

BPPD CONCLUSIONS

1. BPB had identified the following deficiencies in the product chemistry:

a. The corrections of CAS Numbers and the consistency between the product's name on the label and the CSF are acceptable. However, the revised CSF of the alternate formula was not found, and must be submitted.

b. According to the submitted description of the alternate formulation process, [REDACTED] is present and must be included in the revised alternate CSF. Moreover, the statement in the cover letter that the alternate formulation does not contain [REDACTED] is not correct. According to the data from the producer on the composition of [REDACTED] is present in the alternate formula at a rate of [REDACTED]. It is necessary to resubmit the alternate CSF and to include all the ingredients in [REDACTED].

c. The property Oxidation/Reduction and Chemical Compatibility was not addressed in a satisfactory manner in your latest submission. The data submitted addressed the difference between the [REDACTED]. This is not very useful in addressing the Oxidation/Reduction properties of the end-use product. As we stated before, [REDACTED]. It is necessary to perform the test about the oxidative properties of the end use product, and submit the results of your findings.

Inert ingredient information may be entitled to confidential treatment

CONCURRENCES

SYMBOL	7511P						
SURNAME	Bennhard						
DATE	8/11/08						

d. Your resubmission did not respond the request in our previous letter for additional information about the exact purpose of [REDACTED] in the formulations. [REDACTED]

[REDACTED] BPPD would like to know the reasons behind the presence of these ingredients in the formulations.

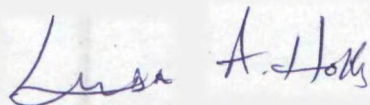
2. Label review will be conducted when the deficiencies listed above are addressed and satisfied.

Your application as submitted under the Pesticide Registration improvement Act (PRIA) guaranteed you a regulatory decision for the action category B 60 of 12 months and a PRIA decision date renegotiated to October 30, 2008. By regulation, the Agency is obligated to give you 75 days (40 CFR 152.105) in which to address the deficiencies identified above. However, there is not enough time remaining before the PRIA decision date October 30, 2008 for you to submit the information requested above and for BPPD to complete the review and we will likely need to renegotiate again the PRIA decision due date. Therefore, you should contact Driss Benmhend immediately upon receipt of this letter to determine when you will be able to address these deficiencies and resubmit the information so that a new PRIA due date can be established.

Alternatively, you may withdraw the application and resubmit when you have all the information or the Agency will issue "a cannot grant" letter under PRIA. You will still have 75 days from the date of this letter to submit the required information before the Agency would withdraw your application because it is incomplete.

If the Agency does issue a letter stating it cannot grant your application under PRIA and you submit the required information within 75 days, the Agency will continue to work on your application, but it will not be subject to the PRIA time frame. Please contact the regulatory action leader, Driss Benmhend, at (703) 308-9525 or at Benmhend.driss@epa.gov immediately or within 15 days from the date of this letter with your response.

Sincerely,



Linda A. Hollis, Chief,
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: July 24, 2008

SUBJECT: Evaluation of the response to deficiency letter in support of application for registration of NEU1173H, containing 26.52 % Ferric HEDTA, a new active ingredient

Decision Number:	382585
DP Number:	354360
Submission Number:	8315511
EPA File Symbol Number:	67702-EA
Chemical Class:	conventional chemical (metal chelate)
PC Code:	Not yet assigned
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Numbers:	474546-03 and 474546-04

FROM: Nina Simeonova, Chemist, NOWCC - SEE
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

In response to the request for additional information discussed in a memorandum from N. Simeonova to D. Benmhend dated May 16, 2008 and relayed in the May 23, 2008 letter from BPPD to the registrant, the authorized agent W. Talarek submitted on behalf of Neudorff GmbH KG cover letter dated June 18, 2008, the studies MRIDs 474546-03 and 474546-04, draft amended basic CSF dated 06/18/2008 and administrative materials in Volume 1 (no MRID assigned). The resubmission is in support of application for registration of NEU1173H, EPA File Symbol 67702-EA, herbicide for commercial and residential areas.

CONCLUSIONS AND RECOMMENDATIONS

1. The evaluation of the responses to deficiencies concerning Product Chemistry follows the consequence in the cover letter of the consultant from June 18, 2008:

Item 1a: The description of the formulation process for the alternate formula is submitted in the Confidential Attachment of MRID 474546-03 in compliance with the requirements set forth in 40CFR§158.165. The resolution of this deficiency is acceptable.

Item 1b: The revision of the nominal concentrations and the certified limits in the draft CSF dated 06/18/2008 is acceptable and now it is consistent with the results from the preliminary analysis. But there are differences between the revised basic CSF and Table 1 on p. 3 in the Confidential Attachment about the percentage of the active ingredient which needs correction.

Item 1c: The corrections of CAS Numbers and the consistency between the product's name on the label and the CSF are acceptable. But the deficiency is not completely resolved because the revised CSF of the alternate formula is not found in the resubmission. [REDACTED] must be included in the revised alternate CSF according to the submitted description of the alternate formulation process. The statement in the cover letter that the alternate formulation does not contain [REDACTED] is not correct. [REDACTED], according to the data about the composition of [REDACTED] from the producer is in the alternate formula in amount of [REDACTED] %. It is necessary to resubmit the alternate CSF and to include the ingredients in [REDACTED]. This deficiency needs additional resolution.

Item 1d: The difference in the toxic properties between the basic and the alternate formulation due to the manufacturing impurity are addressed. The applicant states that the potential hazard is adequately mitigated by appropriate label statement. Data about the biodegradability of [REDACTED] are found in the open literature (Toxnet). They coincide with the statement of the applicant. [REDACTED] is readily biodegradable, does not bioaccumulate and does not persist in the environment.

Item 1e: The property Oxidation/Reduction and Chemical Compatibility is not addressed in a satisfactory manner. The attached materials only point out to the difference between the [REDACTED]. They are not useful in addressing the Oxidation/Reduction properties of the end-use product. [REDACTED]. It is necessary to perform the test about the oxidative properties of the end use product according to OPPTS 830.6314.

Item 1g: The information about the method for determination of pH is provided. The results from testing the storage stability and the potential corrosion to the packaging material are acceptable. NEU 1173H is stable for at least one year at normal storage conditions and does not corrode the packaging material. The results are acceptable.

2. The registrant did not respond to the request for additional information about the exact purpose of [REDACTED] in the formulations.

3. To upgrade the application for registration of NEU1173H to acceptable concerning the Product Chemistry it is necessary to submit the results from testing of the oxidation properties of the end use product, to revise and resubmit the CSF of the alternate formulation and to address the purpose of [REDACTED] in the product, e.g. to explain what property of the product [REDACTED].

STUDIES SUMMARY

MRID 474546-03. NEU1173H. Product Chemistry. The study contains CBI. It is not subject to the requirements of GLP. In Confidential Attachment it contains the statement of the basic formula in Table 1 and a description of the production process of the alternate formulation.

MRID 474546-04. NEU1173H. Product Chemistry. Physical and Chemical Characteristics. The study does not contain CBI. It is conducted in compliance with the principles of GLP. It contains information about the method, the data and the results from testing the storage stability of NEU1173H at ambient storage condition.

Administrative Materials (Vol.1) contain the revised draft CSF (dated 06/18/2008) of the basic formulation of NEU1173H and two excerpts from the public literature concerning the [REDACTED].

cc: N. Simeonova, D. Benmhend, BPPD Chron File, IHAD/ARS.
N. Simeonova, FT, PY-S: 07/24/2008.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: 7/11/2008.

SUBJECT: Science Review in support of the registration of new end-use product, NEU1173H Concentrate herbicide, containing 26.52% w/w iron HEDTA, and end-use product, NEU1173H RTU, containing 1.50% w/w iron HEDTA.

Decision Number: 382588
DP Number: 345601
EPA File Symbol Number: 67702-EA and 67702-ET
Chemical Class: Biochemical
PC Code: 034702
CAS Number: 17084-02-5
Active Ingredient Tolerance Exemptions: Non-food use.
MRID Numbers: 474546-01 to 47546-05.

FROM: Clara Fuentes, Biologist 
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION.

ACTION REQUESTED

W. Neudorff GmbH KG's ("Neudorff") is responding in a letter dated June 18, 2008, to deficiencies identified by the Agency in a deficiency letter dated May 23, 2008. The product is intended for household use as selective herbicide to control/suppress broadleaf weeds growing in lawns, and for commercial use on moss applied by hose sprayer. In support of this registration, the registrant has submitted Product chemistry in MRIDs: 474546-01, 474546-03, and 474546-04; Efficacy data in MRID: 474546-02, and Environmental fate / Non-target effects in MRID: 474546-05.

RECOMMENDATIONS AND CONCLUSIONS

1. The registrant needs to address the following deficiencies:

1a. Deficiency # 1. Product name needs to be consistent on the CSF and product label. The product name is given as "NEU1173H" on the CSF and as "NEU1173H Concentrate" on the product label.

1b. Deficiency #2. The nominal concentration of active ingredient listed on the CSF for the end-use product, 1.50% w/w is inconsistent with the concentration listed on the product label, 1.5 %. Both concentrations listed on CSF and product label should be 1.50%

2. The registrant has adequately resolved the following deficiencies identified below:

2a. The CAS No. [REDACTED] has been added to the CSFs for the concentrate and end-use product formulations. The correct CAS No. [REDACTED] has been corrected on the CSF for the concentrate formulation.

2b. The method for determining the pH has been provided. The method used was CIPAC MT 75.

3. Toxicity. Product toxicity data are acceptable.

4a. Non-target plants data is supplemental. The non-target plants' data, which has been submitted in MRID 474546-02, shows minimal phytotoxic effects on grasses. However, this study is classified as supplemental because the application rates and re-application times do not coincide with those recommended on the label. For the most part, the study is representative of the use pattern and demonstrates the performance of the product, but in order to support label recommendations, the test should have been done accordingly to label instructions.

4b. The request for waiving further testing on additional non-target plants is acceptable. The registrant provides the following rationale for waiving the requirement of OPPTS 850.4000, non-target plants data: 1) Additional non-target dicotyledonous plants (broad leaves other than grasses) were not tested because the active ingredient is also used as a foliar fertilizer to correct iron deficiency; 2) label directions instruct against spraying desirable plants, and if accidentally sprayed, they should be immediately rinsed with enough water; 3) overspraying does not cause significant damage to shrubs, trees, and other garden plants. It is expected that damage will occur to weedy dicots that are thoroughly and directly sprayed with the product to achieve that purpose.

5. Environmental fate: The literature summary of environmental fate data for Fe HEDTA is acceptable. Additional information on hydrolysis, and adsorption/desorption of EDTA in soil has been provided.

Endangered Species Assessment for iron HEDTA: Based on the chemical similarities between iron HEDTA and iron EDTA, available data for iron EDTA and similar iron chelates indicate that adverse effects on threatened and endangered species are unlikely.

Product Performance. Overall, the data shows that the product is effective against its target plants, and phytotoxicity to most grasses is minimal. However, study is deficient in maintaining application rates and times of re-applications consistent with label recommendations. The study is classified as supplemental.

Note to RAL: Product chemistry is been reviewed by Nina Simeonova in a separate memo dated .

STUDY SUMMARIES

Introduction

The product, NEU1173H, containing iron HEDTA as its sole active ingredient, is intended for use as a herbicide, algacide and mossicide for household (residential) uses on lawns, and commercial (terrestrial non-food) on rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. Iron HEDTA has a lethal but non-toxic mode of action, oxidative damage. Iron HEDTA and other similar chelates like Fe EDTA have been applied as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants. Iron HEDTA is not found in toxic/hazardous substance databases (e.g. HSDB, NIOSH, IARC, NTP or OSHA). It is listed as a high production volume (HPV) chemical.

Toxicity

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	> 5000 mg/kg	IV	472074-04
Acute Dermal Toxicity/OPPTS 870.1200	> 5000 mg/kg	IV	472074-05
Acute Inhalation Toxicity/OPPTS 870.1300	> 5.43 mg/L	IV	472074-06

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<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Eye Irritation/OPPTS 870.2400	Mildly irritating	IV	472074-07
Acute Dermal Irritation/OPPTS 870.2500	Non-irritating	IV	472074-08
Skin Sensitization/OPPTS 870.2600	Not skin sensitizer	IV	472074-09

Exposure

Dietary Exposure and Risk Characterization: N/A The product is non-food use

Occupational, Residential, School and Day-Care Exposure and Risk Characterization:
Precautionary statements and use directions on the label are adequate. Use directions provide instructions for avoiding direct contact with the product.

Drinking Water Exposure and Risk Characterization: Although contamination of drinking water is unlikely given the short life of iron chelates and the use pattern of the product, the registrant should provide information on hydrolysis, and adsorption/desorption of NEU1173H in soils in order to completely fulfill the guidelines requirements of OPPTS 835 series.

Acute and Chronic Dietary Risks for Sensitive Subpopulations Particularly Infants and Children:
N/A. The product is non-food use.

Aggregate Exposure: N/A. The product is non-food use.

Cumulative Effects: Bioaccumulation is unlikely. Iron chelates biodegrade rapidly under natural conditions.

Non-Targets

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Avian Acute Oral/OPPTS 850.2100	> 2000 mg/kg bw	Practically non-toxic	47207410
Avian Dietary/OPPTS 850.2200	> 5,000 ppm	Practically non-toxic	47233001
Freshwater Fish LC50/OPPTS 850.1075	96-hr > 100 mg/L	Practically non-toxic	47233002
Freshwater Invertebrate/OPPTS 850.1010	48 hr > 100 mg/L	Practically non-toxic	47233003
Non-target Plants/OPPTS 850.4000	* Not submitted		
Non-target Insects Honey Bee Acute Oral & Contact Toxicity. LD50/OPPTS 850.3020	Oral: 83.7 µg a.i./bee Contact: 48 hr > 100	Toxic Practically non-toxic	47233004

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<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
	µg a.i./bee		
Efficacy data	Minimal grass injury <5% to 20%	Minimal phytotoxicity on grasses.	472074-16

- The registrant states in MRID47207416 for Product Performance study that "Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period (42 days post-application)."

Environmental fate: Iron HEDTA is chemically very similar to ferric EDTA and thus the 2 chelates follow the same pathways of degradation, photodegradation and microbial degradation in waste water, sediments and soils. Due to this chemical similarity, the degradation of the two chelates is very similar. According to Sykora et al. (2001) biological degradation of ethylenediamine-based complexing agents decreases in order of the following substitutes: -COOH₃, -CH₃, -C₂H₅, -CH₂CH₂OH and -CH₂COOH suggesting that HEDTA may be more susceptible to degradation than EDTA. Ferric complexes of EDTA, HEDTA and DTPA are decomposed on exposure to daylight (Hill-Cottingham, 1995). The half-life of ferric EDTA is calculated between 11.3 min to more than 100 h for surface waters containing Fe(III)EDTA (Frank and Rau, 1989; Kari et al, 1995; Svenson et al., 1989). The differences observed in the half-life rates are likely due to differences in light conditions of the experiments. The wavelength of light that is required to photodegrade Fe(III)EDTA is the fraction of sunlight below 400 nm (i.e. in the UV range) (Bucheli-Witschel and Egli, 2001). The rate of photodegradation is also dependent on pH but at measured pH 4 and 8, Fe(III)EDTA was completely degraded in 24 and 32 hours (Lockhart, 1975). Ferric EDTA degrades to ED3A, EDDA-N,N', EDDA-N,N, EDMA, IMDA, glycine and formaldehyde all of which are biodegradable (Metsarinne, 2001). Microbial degradation of ferric EDTA has been documented in numerous studies. In a mixed culture of microorganisms (genus *Methylobacterium*, *Variovarax*, *Enterobacter*, *Aureobacterium* and *Bacillus*) 60% of Fe(III)EDTA was degraded (Bucheli-Witschel, 2001). Ninety percent degradation of ferric EDTA was achieved with a pure culture of *Agrobacterium* sp. (Lauff, 1990). Ferric EDTA was microbially degraded in naturally occurring soils and sediments (Tiedje, 1975 and 1977). Likewise, ferric EDTA was degraded in mixed microbial populations collected from an aerated lagoon (Belly, 1974).

Endangered Species Assessment. Due to chemical similarity between iron HEDTA and Ferric EDTA, the biological effects of these chelates are comparable. Available information on the effects of iron in sodium ferric EDTA on non-target organisms indicates that the iron in these chelates interacts with the hemocyanin in the bloodstream of molluscs and crustaceans, and it would be toxic to mollusks and crustaceans. However, exposure to freshwater crustaceans or mollusks is not unlikely to occur given the intended use of this product as herbicide applied directly to terrestrial plants. Exposure to endangered or threatened terrestrial snails and crustaceans (isopods) is not expected since the currently listed endangered or threatened species pursuant to the Endangered Species Act of 1973, 16 U.S.C. 1531, et seq., are not found in

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locations where the product is intended for use; i.e., home lawns, rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. The habitats of currently listed as threatened or endangered mollusks and crustacean species range from isolated caves and streams to woods or forests.

Product Performance (MRID 474546-02). "A series of greenhouse and field trials were conducted to evaluate the efficacy of NEU1173H (a.i., 26.52% w/w iron HEDTA) against a variety of weeds including dandelion, white clover, English daisy, creeping buttercup, black medick, chickweed, and moss. When applied at the label-recommended rate, the test material was effective against the tested weeds, and its efficacy increased when a second application was made 14 to 28 days after the first one. Lower application rates were less effective. Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period." The reviewer calculates that the application rate used in Test 1 (430 mL/m², calculated to be 460 al/A) slightly exceeds the label recommended rate (5-10 gal/1000 ft², calculated to be 218 – 436 gal/A) for the handheld sprayer used in the test. The application rates in Tests 2 – 17 (200 or 400 mL/m²) are slightly below the recommended rate. In Tests 18 and 19, the reviewer calculates the application rates of 8.9, 17.7, and 26.6 mL/m² to be 9.5, 18.9, and 28.4 gal/A, respectively. The 18.9 gal/A rate slightly exceeds, and the 28.4 gal/A rate greatly exceeds, the label recommended rate of 1 gal/2500 ft² (calculated to be 17 gal/A) for the hose-end sprayers used in the test. Therefore the results for the 26.6 mL/m² rate should be discounted. When used at the recommended application rate, the test material was effective against a variety of weeds, and its efficacy increased when a second application was made (Tests 1, 2, 5, 12, and 19). The product label recommends a second application after three to four weeks. The second application in Tests 1, 2, and 5 was made after two weeks, and in Tests 12 and 19 after about four weeks. Phytotoxicity to grasses was normally minimal (<5%), although it reached 20% in one test. However, by the end of the test the grass had recovered. The application rates and re-application times do not coincide with those recommended on the label. For the most part, the study is representative of the use pattern and demonstrates the performance of the product, but in order to support label recommendations, the test should have been done accordingly to label instructions.

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cc: Clara Fuentes, RAL Driss Benmhend, BPPD Chron File, IHAD/ARS

+

FT, PY-S: date 7/11/08

Contains Confidential Business Information (if app.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: May 16, 2008

SUBJECT: Science Review in Support of the Registration of NEU1173H RTU, containing 1.5 % Ferric HEDTA, a new active ingredient.

Decision Number:	382588
DP Number:	345601
EPA File Symbol Number:	67702-ET
Chemical Class:	conventional chemical (metal complex)
PC Code:	Not yet assigned
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Numbers:	472073-01, 472073-02, 472073-03

FROM: Nina Simeonova, Chemist, NOWCC-SEE *N. Simeonova*
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, RAL
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

On behalf of Neudorff GmbH KG the authorized agent Walter Talarek requests registration of the end use product NEU1173H RTU, which is intended for use as herbicide for commercial and residential areas. It contains 5.65 % of the pending product NEU1173H, EPA File Symbol 67702-ET, [REDACTED] NEU1173H introduces in NEU1173H RTU 1.5 % of the new active ingredient FeHEDTA.

In support of the request the applicant has submitted the studies MRIDs 472073-01, -02 and -03.

Inert ingredient information may be entitled to confidential treatment

RECOMMENDATIONS AND CONCLUSIONS

1a. The resolution of the application for registration of NEU1173H RTU, EPA File Symbol 67702-ET, depends on the resolution of the application for registration of NEU1173H, EPA File Symbol 67702-ET, because NEU1173H RTU is produced by dilution of NEU1173H.

1b. The Product Chemistry Studies are unacceptable, but upgradeable to acceptable upon successful resolution of the following deficiencies:

- No information is provided about which formulation of NEU1173H (basic or alternate or both) will be used as a source of the active ingredient for the production of NEU1173H RTU;
- The applicant must address the possibility of formations of impurities during the production of NEU1173H RTU, not those carried over by NEU1173H, e.g. the possibility of chemical reactions between [REDACTED] and NEU1173H;
- Oxidation/Reduction & Chemical Incompatibility must be addressed for NEU1173H RTU

1c. It is recommended to allow bridging of data from accelerated Storage Stability to Storage Stability at normal storage conditions.

STUDY SUMMARIES

MRID 472073-01. NEU1173H RTU End Use Product. Product Chemistry. Product Identity and Composition. The study contains CBI. It is not subject to the requirements of 40CFR§160. In Confidential Attachment it contains the description of the active ingredient by chemical name, structural and molecular formula. The [REDACTED] is identified by the chemical names and CAS Nos of its active ingredients and the name and the address of the supplier. The production process is [REDACTED]. The enforcement analytical method is the one already described for NEU1173H. The only difference is in the dilution of the sample, which adjusts the procedure to the lower percentage of the active ingredient. The Discussion of Formation of Impurities refers to [REDACTED], which is carried-over in NEU1173H RTU by NEU1173H. Appendix 1 contains MSDS of the pending product and MSDS for [REDACTED]. The study is unacceptable, but upgradeable.

MRID 472073-02. NEU1173H RTU End Use Product. Product Chemistry. Analysis and Certification of Product Ingredients. The study contains CBI. It contains the description of the enforcement analytical method, developed in compliance with 40CFR§160 in MRID 472074-03. The Certification Statement according to 40CFR§180.175(e) is provided. The results for the content of the active ingredient in 5 samples of NEU1173H RTU are displayed in Table 1. The analytical results are in agreement with the proposed certified limits.

MRID 472073-03. NEU1173H RTU End Use Product. Product Chemistry. Physical and Chemical Characteristics. The study does not contain CBI. The data are obtained by test procedures complying with 40CFR§160. The following physical/chemical characteristics are determined: Color, Odor, Density (by CIPAC Method MT159) pH, Flammability and Viscosity. The product is tested by the accelerated (1 month at 50-54°C) procedure, described in CIPAC

MT46 Protocol and already used for NEU1173H. The results are provided in Attachment 1. They have QA from the performing laboratory of ECO-CARE Technologies Inc., Canada. The amount of the active ingredient does not diminish during the test. The study is acceptable.

Note to the RAL:

The draft CSF for NEU1173H RTU is not found in the data package. It seems that the recommendations of the primary reviewer are reasonable.

cc: N. Simeonova, D. Benmhend, BPPD Chron File, IHAD/ARS
N. Simeonova, FT, PY-S. 05/16/2008.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

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OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: May 15, 2008

SUBJECT: Science Review in support of the registration of new end-use product, NEU1173H Concentrate herbicide, containing 26.52% w/w iron HEDTA.

Decision Number: 382588
DP Number: 345601
EPA File Symbol Number: 67702-EA
Chemical Class: Biochemical
PC Code: 034702
CAS Number: 17084-02-5
Active Ingredient Tolerance Exemptions: Non-food use.
MRID Numbers: 47207401 to 47207403; 472074-4 to 09; 472974-10, 472330-01 to -05.

FROM: Clara Fuentes, Biologist
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION.

ACTION REQUESTED

W. Neudorff GmbH KG's ("Neudorff") requests registration of a new end-use product, NEU1173H selective herbicide, containing 26.52% w/w iron HEDTA as its active ingredient. The product is intended for household use as selective herbicide to control/suppress broadleaf weeds growing in lawns, and for commercial use on moss applied by hose sprayer. In support of this registration, the registrant has submitted Product chemistry in MRIDs: 47207401 to 47207403; Acute mammalian toxicity in MRIDs: 472074-4 to 09, Non-target effects, Fate, Transport and Transformation studies in MRIDs: 472974-10, 472330-01 to -05, and Product Performance in MRID: 472074-16.

RECOMMENDATIONS AND CONCLUSIONS

1. The submitted product chemistry data are unacceptable but upgradeable. To upgrade the study to acceptable, the registrant needs to resolve the following deficiencies:

1a. Deficiency #1: The CAS No. for [REDACTED] should be added to the CSF for the basic formulation. The CAS No. for [REDACTED] must be corrected on the CSF for the basic formulation. CAS # [REDACTED] is incorrect. The correct CAS # for [REDACTED]

1b. Deficiency #3: The product name needs to be consistent on the CSFs and product label. The product name is given as "NEU1173H" on the CSFs and as "NEU1173H Concentrate" on the product label.

1c. Deficiency # 5: The method for determining the pH should be provided.

1d. Deficiency #6: Oxidation/reduction and chemical incompatibility should be addressed.

1e. Deficiency # 7: Results from one-year storage stability and corrosion characteristics testing should be provided.

2. Toxicity. Product toxicity data are acceptable.

3. Non-target organisms' data are acceptable, except for non-target plant data, which has not been submitted. The only available phytotoxicity data on grasses is found in Product Performance study (OPPTS 810.3400).

3a. Deficiency # 1: The effect of the proposed product on non-target plants needs to be addressed (OPPTS 850.4000). The registrant needs to submit non-target plant data or rationale for justifying a data waiver request from the requirement of OPPTS 850.4000.

4. Environmental fate: The literature summary of environmental fate data for Fe HEDTA is acceptable pending additional information on hydrolysis, and adsorption/desorption of NEU1173H in soils.

4a. Deficiency # 1: The registrant should provide information on hydrolysis, and adsorption/desorption of NEU1173H in soils in order to completely fulfill the guidelines requirements of OPPTS 835 series.

Endangered Species Assessment for iron HEDTA: Based on the chemical similarities between iron HEDTA and iron EDTA, available data for iron EDTA and similar iron chelates indicate that adverse effects on threatened and endangered species are unlikely.

4. Product Performance. Overall, the data shows that the product is effective against its target plants, and phytotoxicity to most grasses is minimal. However, study is deficient in maintaining application rates and times of re-applications consistent with label recommendations. The study is classified as supplemental.

Note to RAL: Product chemistry is also been reviewed by Nina Simeonova in a separate memo dated May, 16, 2008.

STUDY SUMMARIES

Introduction

The product, NEU1173H, containing iron HEDTA as its sole active ingredient, is intended for use as a herbicide, algacide and mossicide for household (residential) uses on lawns, and commercial (terrestrial non-food) on rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. Iron HEDTA has a lethal but non-toxic mode of action, oxidative damage. Iron HEDTA and other similar chelates like Fe EDTA have been applied as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants. Iron HEDTA is not found in toxic/hazardous substance databases (e.g. HSDB, NIOSH, IARC, NTP or OSHA). It is listed as a high production volume (HPV) chemical.

Product Chemistry

TABLE 1. Nominal CSF concentrations and certified limits for NEU1173H (alternate formulation)^a

Ingredients (CAS number)	PC Code	Purpose	Concentration (% by weight)		
			Nominal	Lower	Upper
Active Ingredient					
<div></div> <div>Iron HEDTA<div></div><div>(CAS No. 17084-02-5)</div></div>	Not found	Active ingredient	<div></div> <div>(26.52)</div>	<div></div> <div>(25.72)</div>	<div></div> <div>(27.32)</div>
Inert Ingredients					

^aData from CSF

Inert ingredient information may be entitled to confidential treatment
Product ingredient source information may be entitled to confidential treatment

Contains Confidential Business Information (if app.)

TABLE 2. Nominal CSF concentrations and certified limits for NEU1173H (basic formulation) ^a					
Ingredients (CAS number)	PC Code	Purpose	Concentration (% by weight)		
			Nominal	Lower	Upper
Active Ingredient					
Iron HEDTA (CAS No. 17084-02-5)	Not found	Active ingredient	26.52	25.72	27.32
Inert Ingredients					

^aData from CSF

^bCAS No. omitted on CSF

* corrected in DER by first reviewer.

Contains Confidential Business Information (if app.)

TABLE 3. Physical and Chemical Properties for NEU1173H¹

Guideline Reference No./Property		Description of Result	Methods
830.6302	Color	Deep red	Visual inspection
830.6303	Physical State	Liquid at room temperature	Visual inspection
830.6304	Odor	Odorless	Olfactory inspection
830.6313	Stability	Not required for EP.	
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not addressed	
830.6315	Flammability	Not applicable, the product does not contain any combustible ingredients	Product knowledge
830.6316	Explosability	Not applicable, the product does not contain any combustible ingredients	
830.6317	Storage Stability	No change in iron HEDTA content when stored for one month at 50°C	Based on CIPAC MT 46
830.6319	Miscibility	Not applicable, the product is not to be mixed with petroleum solvents. Miscible with water in all proportions.	
830.6320	Corrosion Characteristics	No evidence of corrosive effects on HDPE bottles or caps after one month of storage at 50°C.	
830.6321	Dielectric Breakdown Voltage	Not applicable, the product is not for use around electrical equipment.	
830.7000	pH	6.50 ± 0.50	
830.7050	UV/Visible Absorption	Not required for EP.	
830.7100	Viscosity	6 cPs at 30 rpm 11.5 cPs at 60 rpm 4 cPs at 30 rpm Measured with spindle LV1 after one minute at 20°C	Brookfield LVF viscometer
830.7200	Melting Range	Not applicable, product is a liquid.	
830.7220	Boiling Range	Not required for EP.	
830.7300	Density/Relative Density/Bulk Density	Density is 1.29 g/mL at 20°C	CIPAC MT 159
830.7370	Dissociation Constant in Water	Not required for EP.	
830.7550	Partition Coefficient	Not required for EP.	
830.7840	Water Solubility	Not required for EP.	
830.7950	Vapor Pressure	Not required for EP.	

¹Data from MRID 47207403

Toxicity

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	> 5000 mg/kg	IV	472074-04
Acute Dermal Toxicity/OPPTS 870.1200	> 5000 mg/kg	IV	472074-05
Acute Inhalation Toxicity/OPPTS 870.1300	> 5.43 mg/L	IV	472074-06
Acute Eye Irritation/OPPTS 870.2400	Mildly irritating	IV	472074-07
Acute Dermal Irritation/OPPTS 870.2500	Non-irritating	IV	472074-08
Skin Sensitization/OPPTS 870.2600	Not skin sensitizer	IV	472074-09

Exposure

Dietary Exposure and Risk Characterization: N/A The product is non-food use

Occupational, Residential, School and Day-Care Exposure and Risk Characterization:
Precautionary statements and use directions on the label are adequate. Use directions provide instructions for avoiding direct contact with the product.

Drinking Water Exposure and Risk Characterization: Although contamination of drinking water is unlikely given the short life of iron chelates and the use pattern of the product, the registrant should provide information on hydrolysis, and adsorption/desorption of NEU1173H in soils in order to completely fulfill the guidelines requirements of OPPTS 835 series.

Acute and Chronic Dietary Risks for Sensitive Subpopulations Particularly Infants and Children:
N/A. The product is non-food use.

Aggregate Exposure: N/A. The product is non-food use.

Cumulative Effects: Bioaccumulation is unlikely. Iron chelates biodegrade rapidly under natural conditions.

Non-Targets

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Avian Acute Oral/OPPTS 850.2100	> 2000 mg/kg bw	Practically non-oxic	47207410
Avian Dietary/OPPTS 850.2200	> 5,000 ppm	Practically non-toxic	47233001
Freshwater Fish LC50/OPPTS 850.1075	96-hr > 100 mg/L	Practically non-toxic	47233002
Freshwater Invertebrate/OPPTS 850.1010	48 hr > 100 mg/L	Practically non-toxic	47233003
Non-target Plants/OPPTS 850.4000	* Not submitted		
Non-target Insects Honey Bee Acute Oral & Contact Toxicity. LD50/OPPTS 850.3020	Oral: 83.7 µg a.i./bee Contact:: 48 hr > 100 µg a.i./bee	Toxic Practically non-toxic	47233004
Efficacy data	Minimal grass injury <5% to 20%	Minimal phytotoxicity on grasses.	472074-16

- *The registrant states in MRID47207416 for Product Performance study that "Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period (42 days post-application)."*

Environmental fate: Iron HEDTA is chemically very similar to ferric EDTA and thus the 2 chelates follow the same pathways of degradation, photodegradation and microbial degradation in waste water, sediments and soils. Due to this chemical similarity, the degradation of the two chelates is very similar. According to Sykora et al. (2001) biological degradation of ethylenediamine-based complexing agents decreases in order of the following substitutes: -COOH₃, -CH₃, -C₂H₅, -CH₂CH₂OH and -CH₂COOH suggesting that HEDTA may be more susceptible to degradation than EDTA. Ferric complexes of EDTA, HEDTA and DTPA are decomposed on exposure to daylight (Hill-Cottingham, 1995). The half-life of ferric EDTA is calculated between 11.3 min to more than 100 h for surface waters containing Fe(III)EDTA (Frank and Rau, 1989; Kari et al, 1995; Svenson et al., 1989). The differences observed in the half-life rates are likely due to differences in light conditions of the experiments. The wavelength of light that is required to photodegrade Fe(III)EDTA is the fraction of sunlight below 400 nm (i.e. in the UV range) (Bucheli-Witschel and Egli, 2001). The rate of photodegradation is also dependent on pH but at measured pH 4 and 8, Fe(III)EDTA was completely degraded in 24 and 32 hours (Lockhart, 1975). Ferric EDTA degrades to ED3A, EDDA-N,N', EDDA-N,N, EDMA, IMDA, glycine and formaldehyde all of which are biodegradable (Metsarinne, 2001). Microbial degradation of ferric EDTA has been documented

in numerous studies. In a mixed culture of microorganisms (genus *Methylobacterium*, *Variovarax*, *Enterobacter*, *Aureobacterium* and *Bacillus*) 60% of Fe(III)EDTA was degraded (Bucheli-Witschel, 2001). Ninety percent degradation of ferric EDTA was achieved with a pure culture of *Agrobacterium* sp. (Lauff, 1990). Ferric EDTA was microbially degraded in naturally occurring soils and sediments (Tiedje, 1975 and 1977). Likewise, ferric EDTA was degraded in mixed microbial populations collected from an aerated lagoon (Belly, 1974).

Endangered Species Assessment. Due to chemical similarity between iron HEDTA and Ferric EDTA, the biological effects of these chelates are comparable. Available information on the effects of iron in sodium ferric EDTA on non-target organisms indicates that the iron in these chelates interacts with the hemocyanin in the bloodstream of molluscs and crustaceans, and it would be toxic to mollusks and crustaceans. However, exposure to freshwater crustaceans or mollusks is not unlikely to occur given the intended use of this product as herbicide applied directly to terrestrial plants. Exposure to endangered or threatened terrestrial snails and crustaceans (isopods) is not expected since the currently listed endangered or threatened species pursuant to the Endangered Species Act of 1973, 16 U.S.C. 1531, et seq., are not found in locations where the product is intended for use; i.e., home lawns, rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. The habitats of currently listed as threatened or endangered mollusks and crustacean species range from isolated caves and streams to woods or forests.

Product Performance. "A series of greenhouse and field trials were conducted to evaluate the efficacy of NEU1173H (a.i., 26.52% w/w iron HEDTA) against a variety of weeds including dandelion, white clover, English daisy, creeping buttercup, black medick, chickweed, and moss. When applied at the label-recommended rate, the test material was effective against the tested weeds, and its efficacy increased when a second application was made 14 to 28 days after the first one. Lower application rates were less effective. Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period."

The reviewer calculates that the application rate used in Test 1 (430 mL/m², calculated to be 460 gal/A) slightly exceeds the label recommended rate (5-10 gal/1000 ft², calculated to be 218 – 436 gal/A) for the handheld sprayer used in the test. The application rates in Tests 2 – 17 (200 or 400 mL/m²) are slightly below the recommended rate. In Tests 18 and 19, the reviewer calculates the application rates of 8.9, 17.7, and 26.6 mL/m² to be 9.5, 18.9, and 28.4 gal/A, respectively. The 18.9 gal/A rate slightly exceeds, and the 28.4 gal/A rate greatly exceeds, the label recommended rate of 1 gal/2500 ft² (calculated to be 17 gal/A) for the hose-end sprayers used in the test. Therefore the results for the 26.6 mL/m² rate should be discounted. When used at the recommended application rate, the test material was effective against a variety of weeds, and its efficacy increased when a second application was made (Tests 1, 2, 5, 12, and 19). The product label recommends a second application after three to four weeks. The second application in Tests

1, 2, and 5 was made after two weeks, and in Tests 12 and 19 after about four weeks. Phytotoxicity to grasses was normally minimal (<5%), although it reached 20% in one test. However, by the end of the test the grass had recovered. The application rates and re-application times do not coincide with those recommended on the label. For the most part, the study is representative of the use pattern and demonstrates the performance of the product, but in order to support label recommendations, the test should have been done accordingly to label instructions.

REFERENCES.

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Tiedje, J.M. 1977. Influence of environmental parameters on EDTA biodegradation in soils and sediments. J. Env. Qual. Vol. 6, No. 1, 21-26.

cc: Clara Fuentes, RAL Driss Benmhend, BPPD Chron File, IHAD/ARS
Reviewer name, FT, PY-S: date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: May 16, 2008

SUBJECT: Science Review in Support of the Registration of NEU 1173H containing 26.52 % Ferric HEDTA, a new active ingredient.

Decision Number:	382585
DP Number:	345543
EPA File Symbol Number:	67702-EA
Chemical Class:	conventional chemical (metal complex)
PC Code:	Not yet assigned
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Numbers:	472074-01, 742074-02, 472074-03

FROM: Nina Simeonova, Chemist, NOWCC - SEE *N. Simeonova*
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

On behalf of Neudorff GmbH KG the authorized agent Walter Talarek requests registration of the end-use product NEU1173H, EPA File Symbol 67702-EA (basic and alternate formulation) containing 26.5 % of the new active ingredient Ferric HEDTA.

NEU1173H is a non- food use herbicide for commercial and residential areas. The basic formulation of NEU1173H is produced by [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Manufacturing process information may be entitled to confidential treatment

[REDACTED]. The alternate formulation is produced by [REDACTED]
[REDACTED]
[REDACTED].

In support of the request the registrant has submitted product chemistry data in MRIDs 472074-01, 472074-02 and 472074-03, draft basic and alternate CSFs dated 08/10/07 (pin-punched 08/15/2008) and draft label.

RECOMMENDATIONS AND CONCLUSIONS

Product chemistry data are unacceptable, but upgradeable. To upgrade them to acceptable it is necessary:

- To submit description of the production process for the alternate product in compliance with the requirements of 40CFR§158.165, because the basic and alternate formulations are produced by different methods;
- To use self-proposed certified limits of the active ingredient in the basic CSF in compliance with the provisions of 40CFR§158.175(c) in order to assure consistency of the CSF with the results of the preliminary analysis;
- To correct the CAS # for [REDACTED] and to add the CAS # for [REDACTED] in the basic and the alternate CSFs;
- The upper certified limit for the source of the active ingredient [REDACTED] in the alternate formulation does not need correction. It is in compliance with 40CFR§158.175(b) (2) and the value [REDACTED] means that the source of the active ingredient can be over-weighted by [REDACTED] of its nominal value;
- To address the effect on the overall hazardous properties of NEU1173H of the manufacturing impurity [REDACTED]. This impurity is carried –over in the alternate formulation through [REDACTED]
[REDACTED] is not present in the basic formulation and is known to be under toxicological concern;
- To provide data about the property Oxidation/Reduction & Chemical Incompatibility because the product contains [REDACTED];
- It is recommended to comment the purpose of [REDACTED] in the formulations because these ingredients are [REDACTED]
[REDACTED]

It is recommended to allow bridging of data from the accelerated Storage Stability and Corrosion tests to the long term Storage Stability and Corrosion at normal storage conditions on the base of the recommendations in CIPAC MT 46.

STUDY SUMMARIES

MRID 472074-01. NEU1173H End-Use Product. Product Chemistry. Product Identity and composition. The study contains CBI. It is not subject to the requirements of 40CFR§160. In Confidential Attachment it contains description of the active ingredient FeHEDTA by chemical name, molecular and structural formula. The compositions of the basic and the alternate

formulations are provided in Table 1 and table 2. During the production of the basic formulation the [REDACTED] and is identified as manufacturing impurity. The starting materials are identified by chemical name, trade name CAS # and supplier. [REDACTED]

[REDACTED] The steps of the production process of the basic formulation are described and supported by flow-chart. The equipment and the conditions of the process are described. The analytical method is HPLC with external standard and UV-detection. The validation is provided in MRID 472074-03. Appendix 1 contains MSDSs of the starting materials. The study is unacceptable, but upgradeable.

MRID 472074-02. NEU1173H End-Use Product. Product Chemistry. Analysis and Certification of Product Ingredients. The study contains CBI. It is conducted in compliance with the requirements of 40CFR§160. In Confidential Attachment it contains the Certification Statement required by 40CFR§158.175(e). 5 samples of the final product, not identified by Batch Numbers are analyzed by the validated procedure already described in MRID 472074-02. The analytical results are treated statistically. The RSD is 0.97 %, the recovery is 96.78 %. The results for Sample 1 and Sample 2 are outside the certified limits provided in the basic CSF. Supporting chromatograms are attached. The study is unacceptable, but upgradeable.

MRID 472074-03. NEU1173H End-Use Product. Product Chemistry. Physical and Chemical Characteristics. The study does not contain CBI. It is conducted in compliance with the requirements of 40CFR§160. The physical properties Color, Odor, Density, pH, Flammability, Viscosity and Miscibility are determined. The Storage Stability and Corrosion Characteristics are tested for one month at 50-54°C in accelerated procedure described in CIPAC Handbook as Protocol No. MT 46. The product lost approximately 4 % of the initial concentration of the active ingredient under the test conditions. No damage of the packaging material occurred. The protocol states that if a product passes the accelerated test, it will not fail in the long term studies under normal storage conditions. The study is acceptable.

cc: N. Simeonova, D. Benmhend, BPPD Chiron File, IHAD/ARS
N. Simeonova, FT, PY-S: 05/16/2008.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: July 24, 2008

SUBJECT: Evaluation of the response to deficiency letter in support of application for registration of NEU1173H RTU, containing 1.5 % Ferric HEDTA, a new active ingredient

Decision Number:	382585
DP Number:	354360
Submission Number:	831551
EPA File Symbol Number:	67702-ET
Chemical Class:	conventional chemical (metal chelate)
PC Code:	Not yet assigned
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Number:	474546-01

FROM: Nina Simeonova, Chemist, NOWCC - SEE *N. Simeonova*
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

~~THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION~~

ACTION REQUESTED

In response to the request for additional information discussed in a memorandum from N. Simeonova to D. Benmhend dated May 16, 2008 and relayed in a letter from BPPD to the registrant dated May 23, 2008 the authorized agent W. Talarek submitted on behalf of Neudorff GmbH KG a cover letter dated June 18, 2008, the study MRIDs 474546-01 and draft basic CSF dated 06/18/2008. The resubmission is in support of application for registration of NEU1173H RTU, EPA File Symbol 67702-ET, herbicide for commercial and residential areas.

CONCLUSIONS AND RECOMMENDATIONS

1. The application for registration of NEU1173H RTU, EPA File Symbol 67702-ET is still not acceptable because of unsatisfactory resolution of the deficiencies, identified in the Agency's letter. The information which formula (basic, alternative or both) of NEU1173H will be used to produce NEU1173H RTU is not provided. The possibility of formation of impurities during the production process for NEU1173H RTU is not addressed. It is necessary to test the oxidative properties of NEU1173H RTU according to Test Guideline OPPTS 830.6314.

2. The results from testing Storage Stability and Corrosion Characteristics of NEU1173H RTU, EPA File Symbol support the conclusion that the product is stable for at least 1 year at ambient storage conditions and it is not corrosive to the packaging material. The study is acceptable.

STUDY SUMMARY

MRID 474546-01. NEU1173H RTU. Product Chemistry. Physical and Chemical Characteristics. The study is conducted in compliance with GLP and does not contain CBI. It contains description of the method and the results from the testing of Storage Stability and Corrosion Characteristics of NEU1173H RTU at ambient storage conditions. The requested information about the method for determination of pH of the end-use product is provided.

cc: N. Simeonova, D. Benmhend, BPPD Chron File, IHAD/ARS.
N. Simeonova, FT, PY-S; 07/24/2008.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC
SUBSTANCES

Walter G. Talarek, P. C.
Agent for W. Neudorf GmbH KG
1006 Riva Ridge Drive
Great Falls, VA 22066

18 May 2006

CONFIDENTIAL BUSINESS INFORMATION

Dear Mr. Talarek:

Thank you for your application to the Biochemical Classification Committee (BCC) for consideration of the active ingredient, *Fe-HEDTA*, as a potential new biochemical active ingredient in the control of broadleaf weeds. After a re-review of the submitted information, the Committee recommended that *Fe-HEDTA* should be classified as "Not a Biochemical," but eligible for a reduced data set and reviewable in BPPD. This recommendation was based upon the following criteria: (i) *Fe-HEDTA* is not naturally-occurring; and (ii) *Fe-HEDTA* has a lethal, but non-toxic mode of action (oxidative damage) against the target pest.

The Committee still has concerns regarding the relatively high content of [REDACTED]

Please contact Linda Hollis, Biochemical Branch Regulatory Team Leader (hollis.linda@epa.gov) at 703/308-8733 or Dr. Sheryl Reilly, Biochemical Pesticides Branch Chief (reilly.sheryl@epa.gov) at 703/308-8269 to schedule a pre-registration meeting.

Sincerely

Russell S. Jones, Ph.D., Senior Biologist /s/5/18/2006
Chair, Biochemical Classification Committee
Biopesticides & Pollution Prevention Division (7511C)
Office of Pesticide Programs
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1801 South Bell Street
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cc: Sheryl Reilly, Ph.D., Chief, Biochemicals Branch/BPPD
Janet Andersen Ph.D., Director, BPPD

Product Reviewer: William Schneider/DC/USEPA/US Date of initial draft review 04/02/2001 07:54:18 AM
Date reviewed by the Classification Committee 04/05/2001

Active ingredients: Iron (formulated as Fe-Na-EDTA [REDACTED])

Company: Platte Chemical Co. Address:

Company contact: Bruce Riggle

Phone: FAX number: eMail:

Company Representative: Amy Plato Roberts Address: Technology Sciences Group, Inc., 1101 17th Street
NW, Suite 500, Washington, DC 20036

Phone: 202/828-8964 FAX number: 202/872-0745 eMail: aroberts@tsgusa.com

Use Patterns: To suppress slug and snail damage in agronomic and horticultural crops (food and non-food use indicated)

The activity of this product indicates that it is a Molluscicide, Other

Natural Occurrence: Iron is a ubiquitous inorganic element in the environment

Mode of Action: Applicant states that "Slugs and snails are attracted to [REDACTED] pellets which contain the Iron. The Fe-Na-EDTA complex is ingested by slugs/snails, passes through the gut, and the Iron partially acidifies the mollusk's copper-based blood resulting in sickness." Appears to act as an antifeedant.

Proposed Use Rates: Broadcast; rate not specified, but pellets will be 1% Fe

Toxicity survey: None provided. According to the Fact Sheet for Iron Phosphate: Data indicate that Iron phosphate is in "toxicity category IV for acute oral toxicity, category IV for acute dermal toxicity, category III for primary eye irritation, and category IV for primary dermal irritation. Acute inhalation, dermal sensitization, genotoxicity, immunotoxicity, developmental toxicity and subchronic (90 day) oral toxicity studies were waived because of iron phosphates' FDA GRAS (generally regarded as safe) status, the abundance of iron in nature, its low toxicity, its use as a nutritional supplement, and its low water-solubility, which would decrease its absorption across the intestinal epithelium. The Agency has no information to suggest that ferric phosphate has any effect on the immune and endocrine systems. No unreasonable adverse effects to human health are expected from the use of iron phosphate.

Iron Phosphate was classified as "Not a biochemical, but eligible for a reduced data set" by the BCC in 1996. A Slug & Snail Bait product used as a Biochemical Molluscicide was registered by BPPD in 1997.

The BCC decision memo on a similar Slug & Snail bait (Iron Phosphate) used as a molluscicide, determined that the product/ingredient was naturally-occurring but had a "physiological type of action" that was considered to be toxic. In that product, slugs were killed within 3 to 6 days, whereas in the Fe-Na-EDTA product, the mollusks are sickened, "stop feeding, and leave the area."

Similar to Iron Phosphate, a toxic mode of action is indicated for Fe-Na-EDTA.

Decision: As with a similar product (Iron Phosphate), the mode of action may be considered to be toxic, but also might operate as an antifeedant. Despite apparent toxic mode of action, there are no direct lethal effects on target pests

Iron is a common inorganic element having known and predictable mammalian effects and should be eligible for a reduced data set.

Preliminary Data Requirement recommendations: 158.690 (a) Analysis, (c) Biochemical Tox Tier I, (d) Biochem Nontargets Tier I

Comments on data needs/waivers: Full product chemistry study series required. Residue testing and tolerance petition may be required for food use. Tox and Nontargets data requirements may be satisfied by studies and/or waivers. Pre-registration meeting recommended.

Committee Classification: Not a Biochemical but eligible for reduced data set

Management Approval: ☒ Approve

☐ Approve with comment

☐ Needs revision - see comments

☒ Janet L Andersen Director BPPD

☐ Associate Director BPPD

Comments:

Review Division:

☒ BPPD

☐ Registration Division

☐ Antimicrobial Division

Candidate for 25(b) exemption:

☐ Yes

☐ No

DATA PACKAGE BEAN SHEET

Date: 09-Jul-2008

Page 1 of 3

Decision #: 382585

DP #: (354360)

PRIA

Parent DP #:

Submission #: 831551

*** Registration Information ***

Registration: 67702-EA - NEU1173H

Company: 67702 - W. NEUDORFF GMBH KG

Risk Manager: RM 91 - Driss Benmhend - (703) 308-9525 Room# PY1 S-8948

Risk Manager Reviewer: Driss Benmhend DBENMHEN

Sent Date: 24-Jun-2008

Calculated Due Date: 30-Oct-2008

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (B80) NEW AI;NON-FOOD USE;MICROBIAL/BIOCHEMICAL;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 09-Jul-2008

Due Back: _____

DP Ingredient: _____

DP Title: Response to May 23, 08 deficiency letter

CSF Included: ☒ Yes ☐ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: BPPD / BPB

Last Possible Science Due Date: 05-Nov-2007

Team Name: _____

Science Due Date: 15-Jul-2009

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Hi Clara:

Attached, you will find the data submitted to address the deficiencies listed in your review dated May 15, 2008. The PRIA due date for this action is October 30, 2008.

Please review and comment. The due date for your review is August 15, 2008. Please let me know if you need more time.

Thanks

Driss

47454601	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry: Physical and Chemical Characteristics: NEU1173H RTU End-Use Product. Project Number: NEU/1173H/RTU. Unpublished study prepared by Eco-Care Technologies, Inc. 18 p.	830.6317/Storage stability of product
47454601	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry: Physical and Chemical Characteristics: NEU1173H RTU End-Use Product. Project Number: NEU/1173H/RTU. Unpublished study prepared by Eco-Care Technologies, Inc. 18 p.	830.6320/Corrosion characteristics
47454601	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry: Physical and Chemical Characteristics: NEU1173H RTU End-Use Product. Project Number: NEU/1173H/RTU. Unpublished study prepared by Eco-Care Technologies, Inc. 18 p.	830.7000/pH of water solutions or suspensions
47454602	Acceptable/Guideline	Stewart, C.; Diebold, S. (2008) Efficacy Data: NEU1173H End Use Product. Project Number: RSD/2/10, RSD/2/31, RSD/2/33. Unpublished study prepared by Eco-Care Technologies, Inc. 83 p.	810.1000/Overview, Definitions, and General Considerations
47454603	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry: NEU1173H End-Use Product. Unpublished study prepared by Eco-Care Technologies, Inc. 5 p.	830.1550/Product Identity and composition
47454603	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry: NEU1173H End-Use Product. Unpublished study prepared by Eco-Care Technologies, Inc. 5 p.	830.1650/Description of formulation process
47454604	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry Physical and Chemical Characteristics: NEU1173H End-Use Product. Project Number: NEU/1173H/061013/1. Unpublished study prepared by Eco-Care Technologies, Inc. 20 p.	830.6317/Storage stability of product
47454604	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry Physical and Chemical Characteristics: NEU1173H End-Use Product. Project Number: NEU/1173H/061013/1. Unpublished study prepared by Eco-Care Technologies, Inc. 20 p.	830.6320/Corrosion characteristics
47454604	Acceptable/Guideline	Almond, D.; Stewart, C. (2008) Product Chemistry Physical and Chemical Characteristics: NEU1173H End-Use Product. Project Number: NEU/1173H/061013/1. Unpublished study prepared by Eco-Care Technologies, Inc. 20 p.	830.7000/pH of water solutions or suspensions
47454605	Acceptable/Guideline	Stewart, C. (2008) Environmental Fate: NEU1173H End-Use Product. Unpublished study prepared by Eco-Care Technologies, Inc. 72 p.	835.1230/Sediment and soil absorption/desorption for parent and degradates
47454605	Acceptable/Guideline	Stewart, C. (2008) Environmental Fate: NEU1173H End-Use Product. Unpublished study prepared by Eco-Care Technologies, Inc. 72 p.	835.2120/Hydrolysis of parent and degradates as a function of pH at 25 C



Walter Talarek
<wtalarek@verizon.net>

08/18/2008 04:37 PM

Please respond to
wtalarek@verizon.net

To Driss Benmhend/DC/USEPA/US@EPA

cc Linda Hollis/DC/USEPA/US@EPA, cameron wilson
<cam@neudorff.ca>, diana parker <diana@ecocare.bc.ca>,
catherine stewart <catherine@ecocare.bc.ca>

bcc

Subject NEU1173H and NEU1173H RTU

Dear Driss,

I have received Linda Hollis' letter of August 8, 2008, concerning issues that must be resolved before EPA car registration of NEU1173H and NEU1173H RTU, EPA File Symbols 67702-EA and 67702-ET. In response, N issues. Therefore, Neudorff would like to discuss with you the establishment of a new PRIA date based on this:

The need for 30 days is based on Neudorff contracting with Product Safety Labs (PSL) in Dayton, NJ to conduct PSL's assurance that final reports for these studies will be available within this timeframe.

Please contact me at your earliest convenience to discuss a new PRIA due date.

Thank you.

Walt Talarek
Authorized Agent
W. Neudorff GmbH KG
703-759-4837

I called Mr. Talarek and told him that we can not start talks about renegotiating the due date. I explained to him that Once he makes the submission to FEP where all the deficiencies are addressed, then we can set a new renegotiated due date. Mr. Talarek agreed and promised to notify me when he make a submission to FEP.

Driss

LAW OFFICES OF
 WALTER G. TALAREK, P.C.
 1008 RIVA RIDGE DRIVE
 GREAT FALLS, VIRGINIA 22066

 PHONE: (703) 759-4837
 FAX: (703) 759-5548

June 18, 2008

DELIVERED BY COURIER

Linda A. Hollis, Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution Prevention Division (7511P)
 Office of Pesticide Program
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 S. Crystal Drive
 Arlington, VA 22202

Re: Applications for Registration of NEU1173H and NEU1173H RTU
 EPA File Symbols 67702-EA and 67702-ET
 Applications Dated August 15, 2007
 Your Letter Dated May 23, 2008

Dear Ms. Hollis:

W. Neudorff GmbH KG ("Neudorff") has received your letter of May 23, 2008, concerning its applications for registration of NEU1173H and NEU1173H RTU, EPA File Symbols 67702-EA and 67702-ET, respectively. In your letter you identify certain deficiencies in the product chemistry supporting the applications for registration for these products. In response, Neudorff is submitting the following information, data, explanations and waiver requests. Neudorff's responses are keyed to the numbered items in your letter.

Item 1a: You requested a description of the production process for the alternate formulation for NEU1173H which complies with 40 CFR § 158.165. In response, please find enclosed such a description in Volume 18. Volume 18 also includes a revised Table 1 "Statement of Basic Formula for NEU1173H" which incorporates changes being made to the confidential statement of formula for the basic formulation ("CSF") (see Items 1b and 1c below).

Item 1b: You requested a new CSF for the basic formulation for NEU1173H in which self-proposed certified limits for the active ingredient are included. In response, please find enclosed a new CSF. Also, please note that this corrected CSF incorporates revised nominal concentrations and upper and lower certified limits for [REDACTED].

Item 1c: You requested corrected CSFs for the basic and alternate formulations for NEU1173H in which the correct CAS number for [REDACTED] is used, a CAS number for [REDACTED] is included, and the product's name is consistent. In response, please find enclosed a corrected CSF for the basic formulation. Please note that the alternate formulation does not contain [REDACTED]. Also, please note that the product's name is NEU1173H, and therefore this name has been left on the product's CSFs. The word "Concentrate" will be removed from the name "NEU1173H Concentrate" which appears on the labels submitted with the application for registration.

Item 1d: You wanted the toxicological effects of [REDACTED] [REDACTED] is listed under the alternate name [REDACTED] on EPA's current list of "Inert Ingredients Permitted for Nonfood Use in Pesticide Products" (January 7, 2008). As such, it is an accepted inert ingredient for use in nonfood pesticides, which is the case with the products subject to these applications. Moreover, the properties of [REDACTED] are well known, and its toxicology is published in prominent toxicology databases, e.g. HSDS, CCRIS and GENETOX. Furthermore, in the NEU1173H product, the directions for use instruct the user to dilute the product 25 fold, and this reduces the amount of this impurity as applied in the field to [REDACTED]. Thus, applicator exposure to the impurity is minimal. In addition, [REDACTED] degrades readily and does not persist in the environment. Therefore, Neuorff submits that the product's label directions are adequate to protect applicators from potential adverse acute, sub-chronic and chronic effects.

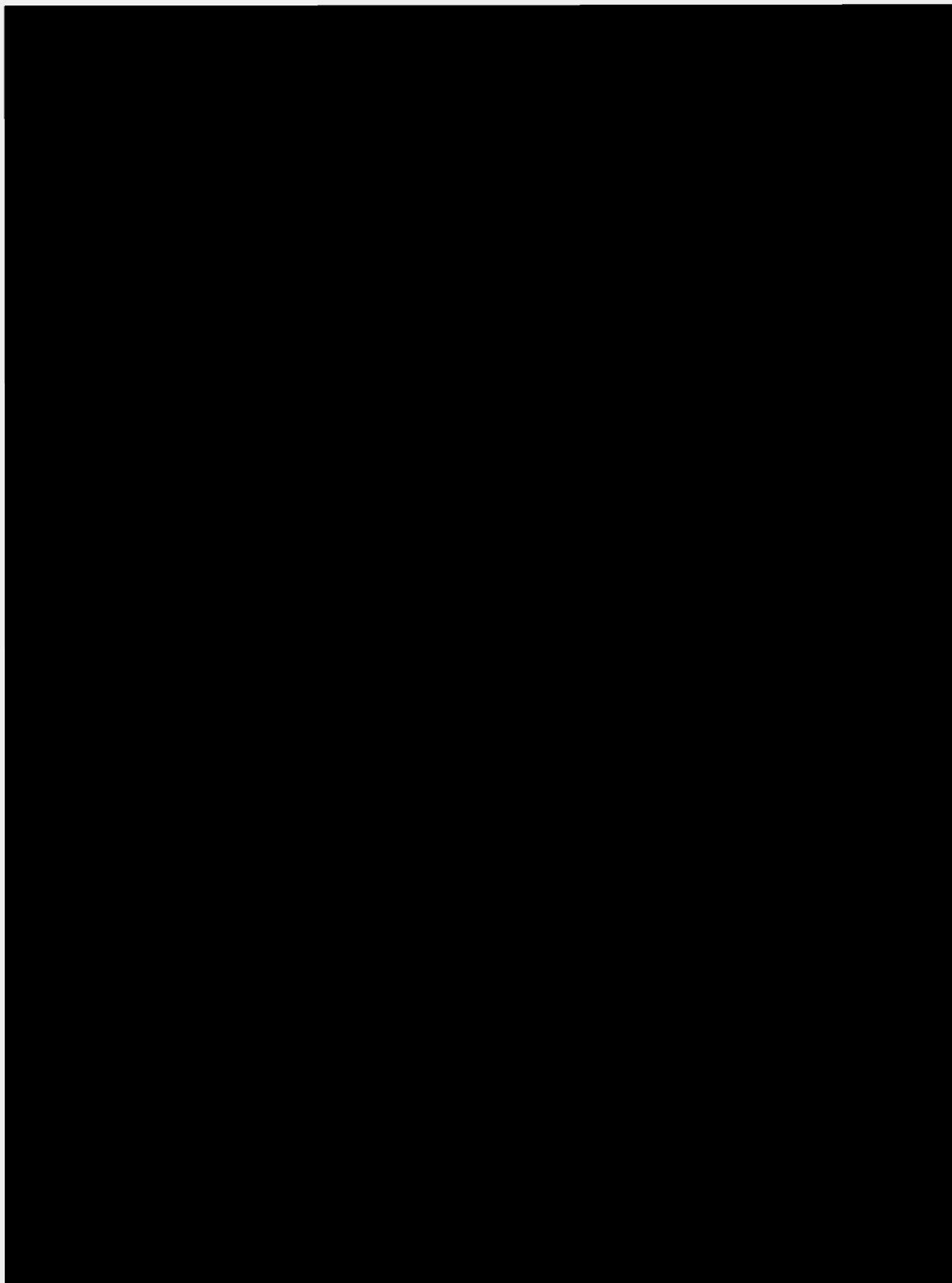
Item 1e: General

You requested oxidation/reduction and chemical incompatibility data on [REDACTED].

[REDACTED] is listed on EPA's current list of "Inert Ingredients Permitted for Nonfood Use in Pesticide Products" (January 7, 2008). As such, it is an accepted inert ingredient for use in nonfood pesticides, which is the case with the products subject to this application.

EPA has promulgated tolerance exemptions for [REDACTED]. See 40 CFR § 180.920. Because of these exemptions, [REDACTED] is considered an acceptable inert ingredient for use in pesticide products used on food.

Manufacturing process information may be entitled to confidential treatment



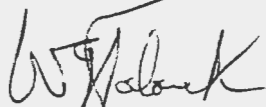
Item 2: You requested data on the effects of the products on non-target plants. In response, Neudorff has enclosed Volume 17, which is the efficacy data package that it supplied as part of its concurrent applications for registration to the California Department of Pesticide Regulation. Included in the volume are efficacy trials that report the lack of phytotoxic effects on grasses of NEU1173H. These are summarized on pages 78 to 83. The selectivity of this product to dicots enables it to be applied to broadleaf weeds in lawns without causing damage to grasses (monocots).

Additional non-target plants were not tested because: a) the active ingredient in this product is also used as a liquid foliar fertilizer that corrects iron deficiency, and is commonly applied directly to plants for this use; and b) this product is a selective herbicide that controls broadleaf weeds without damaging grasses. It is expected that damage will occur to weedy dicots that are sprayed directly with the product, but a thorough spray application is required to achieve this affect. Label instructions advise against spraying desirable plants, and any desirable plants or structures accidentally contacted should be rinsed with water. However, it should be noted that overspray of this herbicide does not cause significant damage to shrubs, trees, garden plants, etc.

Item 3: You requested information on the hydrolysis and adsorption/desorption of NEU1173H. In response, please find enclosed such information in Volume 20.

If you have any questions about this response, please feel free to contact me.

Sincerely yours,



Walter G. Talarek

Enclosures

TRANSMITTAL DOCUMENT

1. Name and address of submitter

W. Neudorff GmbH KG
c/o Walter G. Talarek, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

2. Regulatory action in support of which this package is submitted

Applications for registration of NEU1173H and NEU1173H RTU, EPA File
Symbols 67702-EA and 67702-ET
Response to EPA Letter Dated May 23, 2008

3. Transmittal date

June 18, 2008

4. List of submitted studies

	Volume 1	Administrative Materials
47454801	Volume 5	Product Chemistry: Physical and Chemical Characteristics; NEU1173H RTU
47454802	Volume 17	Product Performance: Efficacy Data
47454803	Volume 18	Product Chemistry: Product Identity and Composition; Formulation Process; NEU1173H
47454804	Volume 19	Product Chemistry: Physical and Chemical Characteristics; NEU1173H
47454805	Volume 20	Environmental Fate: Adsorption/Desorption and Hydrolysis

Company Official: Walter G. Talarek
Authorized Agent


Signature

Company Name: W. Neudorff GmbH KG

Company Contact: Walter G. Talarek
Name

(703) 759-4837
Phone

1, 2008 (Volume 73, Number 22, Pages 6181–6182)]. The purpose of this upcoming teleconference is for the SAB Panel to discuss and finalize its draft report. Additional information about this advisory activity can be found on the SAB Web site at <http://www.epa.gov/sab>. A meeting agenda and the draft SAB review report will be posted at the above noted SAB Web site prior to the meeting.

Availability of Meeting Materials: The meeting agendas and other materials including the SAB panel's draft report will be available on the SAB Web site at (<http://www.epa.gov/sab>) in advance of the meeting. For technical questions and information concerning the EPA's IRIS assessment, please contact Dr. Rob Dewoskin, at (919) 541-1089, or dewoskin.rob@epa.gov.

Procedures for Providing Public Input: Interested members of the public may submit relevant written or oral information for the SAB Panel to consider throughout the advisory process. **Oral Statements:** In general, individuals or groups requesting an oral presentation at a public SAB teleconference will be limited to three minutes per speaker, with no more than a total of one-half hour for all speakers. To be placed on the public speaker list, interested parties should contact Dr. Sue Shallal, DFO, in writing (preferably via e-mail), by July 9, 2008. **Written Statements:** Written statements should be received in the SAB Staff Office by July 9, 2008, so that the information may be made available to the SAB for their consideration prior to the teleconference. Written statements should be supplied to the DFO via e-mail to shallal.suhair@epa.gov (acceptable file format: Adobe Acrobat PDF, WordPerfect, MS Word, MS PowerPoint, or Rich Text files in IBM-PC/Windows 98/2000/XP format).

Accessibility: For information on access or services for individuals with disabilities, please contact Dr. Sue Shallal at (202) 343-9977 or shallal.suhair@epa.gov. To request accommodation of a disability, please contact Dr. Shallal preferably at least ten days prior to the meeting, to give EPA as much time as possible to process your request.

Dated: June 18, 2008.

Vanessa T. Vu,

Director, EPA Science Advisory Board Staff Office.

[FR Doc. E8-14402 Filed 6-24-08; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OPP-2008-0470; FRL-8368-3]

Pesticide Products; Registration Applications

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: This notice announces receipt of applications to register pesticide products containing new active ingredients not included in any currently registered products pursuant to the provisions of section 3(c)(4) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended.

DATES: Comments must be received on or before July 25, 2008.

ADDRESSES: Submit your comments, identified by docket identification (ID) number EPA-HQ-OPP-2008-0470, by one of the following methods:

- **Federal eRulemaking Portal:** <http://www.regulations.gov>. Follow the on-line instructions for submitting comments.
- **Mail:** Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P), Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460-0001.
- **Delivery:** OPP Regulatory Public Docket (7502P), Environmental Protection Agency, Rm. S-4400, One Potomac Yard (South Bldg.), 2777 S. Crystal Dr., Arlington, VA. Deliveries are only accepted during the Docket's normal hours of operation (8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays). Special arrangements should be made for deliveries of boxed information. The Docket Facility telephone number is (703) 305-5805.

Instructions: Direct your comments to docket ID number EPA-HQ-OPP-2008-0470. EPA's policy is that all comments received will be included in the docket without change and may be made available on-line at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through www.regulations.gov or e-mail. The www.regulations.gov website is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly

to EPA without going through www.regulations.gov, your e-mail address will be automatically captured and included as part of the comment that is placed in the docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, any form of encryption, and be free of any defects or viruses.

Docket: All documents in the docket are listed in the docket index available in www.regulations.gov. To access the electronic docket, go to <http://www.regulations.gov>, select "Advanced Search," then "Docket Search." Insert the docket ID number where indicated and select the "Submit" button. Follow the instructions on the www.regulations.gov website to view the docket index or access available documents. Although, listed in the index, some information is not publicly available, e.g., CBI or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is not placed on the Internet and will be publicly available only in hard copy form. Publicly available docket materials are available either in the electronic docket at <http://www.regulations.gov>, or, if only available in hard copy, at the OPP Regulatory Public Docket in Rm. S-4400, One Potomac Yard (South Bldg.), 2777 S. Crystal Dr., Arlington, VA. The hours of operation of this Docket Facility are from 8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays. The Docket telephone number is (703) 305-5805.

FOR FURTHER INFORMATION CONTACT: Driss Benmhend, Biopesticides and Pollution Prevention Division, Office of Pesticide Programs, Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460-0001; telephone number: (703) 308-9525; e-mail address: benmhend.driss@epa.gov.

SUPPLEMENTARY INFORMATION:

I. General Information

A. Does this Action Apply to Me?

You may be potentially affected by this action if you are an agricultural producer, food manufacturer, or pesticide manufacturer. Potentially affected entities may include, but are not limited to:

- Crop production (NAICS code 111).
- Animal production (NAICS code 112).
- Food manufacturing (NAICS code 311).
- Pesticide manufacturing (NAICS code 32532).

This listing is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely to be affected by this action. Other types of entities not listed in this unit could also be affected. The North American Industrial Classification System (NAICS) codes have been provided to assist you and others in determining whether this action might apply to certain entities. If you have any questions regarding the applicability of this action to a particular entity, consult the person listed under **FOR FURTHER INFORMATION CONTACT**.

B. What Should I Consider as I Prepare My Comments for EPA?

1. **Submitting CBI.** Do not submit this information to EPA through www.regulations.gov or e-mail. Clearly mark the part or all of the information that you claim to be CBI. For CBI information in a disk or CD-ROM that you mail to EPA, mark the outside of the disk or CD-ROM as CBI and then identify electronically within the disk or CD-ROM the specific information that is claimed as CBI. In addition to one complete version of the comment that includes information claimed as CBI, a copy of the comment that does not contain the information claimed as CBI must be submitted for inclusion in the public docket. Information so marked will not be disclosed except in accordance with procedures set forth in 40 CFR part 2.

2. **Tips for preparing your comments.** When submitting comments, remember to:

- i. Identify the document by docket ID number and other identifying information (subject heading, **Federal Register** date and page number).
- ii. Follow directions. The Agency may ask you to respond to specific questions or organize comments by referencing a Code of Federal Regulations (CFR) part or section number.
- iii. Explain why you agree or disagree; suggest alternatives and substitute language for your requested changes.
- iv. Describe any assumptions and provide any technical information and/or data that you used.
- v. If you estimate potential costs or burdens, explain how you arrived at your estimate in sufficient detail to allow for it to be reproduced.

vi. Provide specific examples to illustrate your concerns and suggest alternatives.

vii. Explain your views as clearly as possible, avoiding the use of profanity or personal threats.

viii. Make sure to submit your comments by the comment period deadline identified.

II. Registration Applications

EPA received applications as follows to register pesticide products containing active ingredients not included in any previously registered products pursuant to the provision of section 3(c)(4) of FIFRA. Notice of receipt of these applications does not imply a decision by the Agency on the applications.

Application Form

File Symbols: 67702-EA and ET.
Applicant: Neudorff GmbH KG c/o Walter G. Talarek PC, 1008 Riva Ridge Drive, Great Falls, VA 22066-1620
Product names: NEU1173H Concentrate and NEU1173H RTU. **Type of product:** Herbicide. **Active ingredient:** Iron HEDTA (FeHEDTA) at and 26.52% and 1.5% respectively. **Proposal classification/Use:** Household and Commercial use. (D. Benmhend).

List of Subjects

Environmental protection, Pesticides and pest.

Dated: June 13, 2008.

Janet L. Andersen,
 Director, Biopesticides and Pollution Prevention Division, Office of Pesticide Programs.

[FR Doc. E8-13877 Filed 6-24-08; 8:45 a.m.]

BILLING CODE 6560-50-S

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OPP-2008-0170; FRL-8367-9]

Pesticide Registration Review; New Dockets Opened for Review and Comment; Closure of the Phosalone Registration Review Case

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: EPA has established registration review dockets for the pesticides listed in the table in Unit III.A. With this document, EPA is opening the public comment period for these registration reviews. The Agency is also announcing the closure of the phosalone registration review case (0027). Registration review is EPA's periodic review of pesticide registrations to ensure that each

pesticide continues to satisfy the statutory standard for registration, that is, the pesticide can perform its intended function without unreasonable adverse effects on human health or the environment. Registration review dockets contain information that will assist the public in understanding the types of information and issues that the Agency may consider during the course of registration reviews. Through this program, EPA is ensuring that each pesticide's registration is based on current scientific and other knowledge, including its effects on human health and the environment.

DATES: Comments must be received on or before September 23, 2008.

ADDRESSES: Submit your comments identified by the docket identification (ID) number for the specific pesticide of interest provided in the table in Unit III.A., by one of the following methods:


• **Federal eRulemaking Portal:** <http://www.regulations.gov>. Follow the on-line instructions for submitting comments.

• **Mail:** Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P), Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460-0001.

• **Delivery:** OPP Regulatory Public Docket (7502P), Environmental Protection Agency, Rm. S-4400, One Potomac Yard (South Bldg.), 2777 S. Crystal Dr., Arlington, VA. Deliveries are only accepted during the Docket's normal hours of operation (8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays). Special arrangements should be made for deliveries of boxed information. The Docket Facility telephone number is (703) 305-5805.

Instructions: Direct your comments to the docket ID numbers listed in the table in Unit III.A. for the pesticides you are commenting on. EPA's policy is that all comments received will be included in the docket without change and may be made available on-line at <http://www.regulations.gov>, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through www.regulations.gov or e-mail. The www.regulations.gov website is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through www.regulations.gov, your e-mail address

**Recommendation of Division Directors
Negotiated Due Dates**

Decision#: 382585	Registration#: 67702-EA	Petition #: N/A
Fee Category: B60		PRIA Decision Time Frame: 12 months
Submitted by: Driss Benmhend	Branch: BPB	Date: June 3, 2008
Company: Neudorff GmbH KG.		
Original Due Date: August 30, 2008		Proposed New Due Date: October 30, 2008
Previous Negotiated Due Dates: None (this is the company's first renegotiation)		
Is the "Fix" in-house? No		If not, date "Fix" expected: June 20, 2008
Issue (describe in detail): BPPD reviews identified deficiencies relating to product chemistry, effect on non-target plants, environmental fate issues. A deficiency letter was mailed to the applicant on May 23, 2008.		
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u>D</u> Non-target effects: <u>D</u> Labeling: <u> </u> Other (describe): <u>D</u>		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The registrant was notified on May 23, 2008 that the review of the data submitted to support his application has some deficiencies. Upon receipt of the deficiency letter the registrant notified BPPD that he will address the deficiencies and send a revised submission by June 20, 2008. He was also extremely cooperative over the fact the PRIA due date will have to be renegotiated. On May 30, 2008, the registrant sent an e-mail with new PRIA due date of October 30, 2008.		
"75 Day" Letter sent? <u> </u> Yes <u> </u> (Date sent) May 23, 2008 <u> </u> No and reason for none?		
Rationale for Proposed Due Date: The applicant will address the deficiencies listed in BPPD's letter and will submit a response by June 20, 2008. BPPD will need about 4 months to complete the review and make regulatory decision for this B 60 action.		
Registrant notified that this is the last negotiation? <u> </u> Yes <u> </u> X <u> </u> Not Applicable		
Approve: <u> </u> ✓ <u> </u>		Disapprove: <u> </u>
If disapproved, action to be taken:		
OD or DOD Signature: 		Date: 6-5-08

**ROUTING AND TRANSMITTAL SLIP
FOR PRIA RENEGOTIATION**

TO: **INITIALS/DATE**

- | | |
|--|---------------------------|
| 1. Branch Chief:
Linda Hollis | <u>LT</u> / <u>u3</u> |
| 2. Janet Andersen, Division Director
(place in Renegotiation box) | ____ / ____ |
| 3. Doris Mack (Rm.S12624) | <u>DM</u> / <u>6/4/08</u> |
| 4. Marty Monell, Deputy Office Director | <u>MM</u> / <u>6-5</u> |
| 5. Doris Mack:
(copy to Elizabeth Leovey) | ____ / ____ |
| 6. Janet Andersen (Rm. S8723)
Diana Hudson (Rm. S8953) | ____ / ____ |

Remarks: On May 30, 2008, BPPD received an e-mail from Mr. Walter Talarek, acting on behalf of Neudorff, requesting to extend the PRIA due date of August 30, 2008 to October 30, 2008.

DM

RECEIVED
FO
JUN 4 2008
9799

FROM: Driss Benmhend

Rm. #: S8948

PHONE #: 703-308-9525

(F:/user/share/BPPD/Forms/Routing Slip for Renegotiation)

Checklist for Renegotiation Approval Process

Registration Package

- (✓) 2 copies of current form; Succinctly answer all questions, especially:
 - (1) is fix in?
 - (2) if not, when will fix come in?
 - (3) category of deficiency (i.e., 86-5, product chemistry)
- (✓) 1 copy of e-mail or letter from Registrant/Consultant accepting new proposed date
- () Separate folder and forms for each decision number being renegotiated

Re-negotiation Approval Process

- () Place completed form in renegotiation box in Division Director's office
- () Form to Doris Mack for log-in and routing to Marty Monell
- () Form BPPD box then return form to Janet Andersen or Diana Hudson

BPPD Processing Procedures

- () Make date change in OPPIN and returned package to RAL
- () Inform Todd Peterson by email of due date change and cc: to appropriate Branch Chief
- () Copy to Diana Hudson
- () Original to RAL
- () RAL sends email with new data to applicant
- () RAL puts original form and copies of all relevant emails in the Jacket



Walter Talarek
<wtalarek@verizon.net>

05/30/2008 09:31 AM

To Driss Benmhend/DC/USEPA/US@EPA

cc diana parker <diana@ecocare.bc.ca>, catherine stewart
<catherine@ecocare.bc.ca>, cameron wilson
<cam@neudorff.ca>

bcc

Subject Applications for Registration of NEU1173H and NEU1173H
RTU

Dear Driss,

This is confirm my understanding of our conversation of this morning concerning W. Neudorff GmbH KG's (Neudorff's) applications for registration of NEU1173H and NEU1173H RTU, EPA File Symbols 67702-EA and 67702-ET. Linda Hollis' letter of May 23, 2008, regarding these applications identified certain deficiencies that need to be addressed by Neudorff. Based on Neudorff being able to submit a response to Linda's letter by June 20, 2008, and the time needed by EPA to review Neudorff's response, we agreed that the PRIA due date for these applications would be extended to October 30, 2008.

Please confirm that my understanding of our conversation is correct.

Thank you.

Walt Talarek
Authorized Agent
W. Neudorff GmbH KG
703-759-4837

MAY 23 2008

Walter G. Talarek
Regulatory Consultant for Neudorff GmbH KG
Walter G. Talarek, P. C.
1008 Riva Ridge Drive
Great Falls, VA 22066

Subject: Application to Register the Products NEU1173H and NEU1173H RTU
EPA File Symbol: 67702-EA and ET
Application dated: August 15, 2007

Dear Mr. Talarek

The Biopesticides and Pollution Prevention Division (BPPD) has reviewed the application referred to above, submitted in connection with registration under FIFRA section 3(c)(5). BPPB has concluded your application is **not** acceptable, and that the following deficiencies **must** be addressed before we can proceed with the review of your submission and issue the registration for these products.

BPPD CONCLUSIONS

1. BPPB had identified the following deficiencies in the product chemistry:

- a. The description of the production process for the alternate product is **not** acceptable. The basic and alternate formulations are produced by different methods. As a result, you have to submit a description of the production process that complies with the requirements under 40 CFR§158.165, for the alternate product.
- b. To insure consistency of the CSF with the results of the preliminary analysis and to comply with the provisions of 40 CFR§158.175(c), you must use self-proposed certified limits of the active ingredient in the basic CSF.
- c. You must correct the CAS number for [REDACTED] and to add the CAS number for [REDACTED] in the basic and the alternate CSFs. Moreover, the product name needs to be consistent in both the CSF and the label.
- d. The manufacturing impurity [REDACTED] is carried over in the alternate formulation through [REDACTED] in the amount of [REDACTED] [REDACTED] is known to have some toxicological effects. These concerns must be addressed in the overall hazardous properties of the product NEU1173H.
- e. The product contains [REDACTED].
- f. [REDACTED] BPPD would like to know the reasons behind the presence of these ingredients in the formulations.

CONCURRENCES

SYMBOL	▶	7511P						
SURNAME	▶	Benmhend						
DATE	▶	5/21/08						

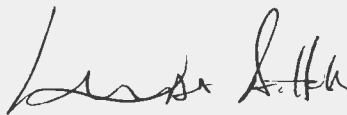
- g. The following deficiencies have to be addressed:
- i. Method for determining the pH must be provided
 - ii. Results from one year stability and corrosion characteristics testing must be submitted.
2. The effects of the proposed product on non-target plants must be addressed (OPPTS 850.4000). This data requirement can be addressed by submitting a study or a scientific rationale to justify a waiver request.
3. Additional information on the environmental fate of the product is needed. You must provide information on the hydrolysis and absorption/desorption of NEU1173H in the soil in order to comply with the requirements under OPPTS 835 series.
4. Label review will be conducted when the deficiencies listed above are addressed and satisfied.

Your application as submitted under the Pesticide Registration improvement Act (PRIA) guaranteed you a regulatory decision for the action category B 60 of 12 months and a PRIA decision date of August 30, 2008. By regulation, the Agency is obligated to give you 75 days (40 CFR 152.105) in which to address the deficiencies identified above. However, there is not enough time remaining before the PRIA decision date of August 30, 2008 for you to submit the information requested above and for BPPD to complete the review and we will likely need to renegotiate the PRIA decision due date. Therefore, you should contact Driss Benmhend immediately upon receipt of this letter to determine when you will be able to address these deficiencies and resubmit the information so that a new PRIA due date can be established.

Alternatively, you may withdraw the application and resubmit when you have all the information or the Agency will issue "a cannot grant" letter under PRIA. You will still have 75 days from the date of this letter to submit the required information before the Agency would withdraw your application because it is incomplete.

If the Agency does issue a letter stating it cannot grant your application under PRIA and you submit the required information within 75 days, the Agency will continue to work on your application, but it will not be subject to the PRIA time frame. Please contact the regulatory action leader, Driss Benmhend, at (703) 308-9525 or at Benmhend.driss@epa.gov immediately or within 7 days from the date of this letter with your response.

Sincerely,



Linda A. Hollis, Chief,
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

Enclosures



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**



OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: May 15, 2008

SUBJECT: Science Review in support of the registration of new end-use product, NEU1173H Concentrate herbicide, containing 26.52% w/w iron HEDTA.

Decision Number: 382588
DP Number: 345601
EPA File Symbol Number: 67702-EA
Chemical Class: Biochemical
PC Code: 034702
CAS Number: 17084-02-5
Active Ingredient Tolerance Exemptions: Non-food use.
MRID Numbers: 47207401 to 47207403; 472074-4 to 09; 472974-10, 472330-01 to -05.

FROM: Clara Fuentes, Biologist
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION.

ACTION REQUESTED

W. Neudorff GmbH KG's ("Neudorff") requests registration of a new end-use product, NEU1173H selective herbicide, containing 26.52% w/w iron HEDTA as its active ingredient. The product is intended for household use as selective herbicide to control/suppress broadleaf weeds growing in lawns, and for commercial use on moss applied by hose sprayer. In support of this registration, the registrant has submitted Product chemistry in MRIDs: 47207401 to 47207403; Acute mammalian toxicity in MRIDs: 472074-4 to 09, Non-target effects, Fate, Transport and Transformation studies in MRIDs: 472974-10, 472330-01 to -05, and Product Performance in MRID: 472074-16.

RECOMMENDATIONS AND CONCLUSIONS

1. The submitted product chemistry data are unacceptable but upgradeable. To upgrade the study to acceptable, the registrant needs to resolve the following deficiencies:

1a. Deficiency #1: The CAS No. for [REDACTED] should be added to the CSF for the basic formulation. The CAS No. for [REDACTED] must be corrected on the CSF for the basic formulation. CAS # [REDACTED] is incorrect. The correct CAS # for [REDACTED]

1b. Deficiency #3: The product name needs to be consistent on the CSFs and product label. The product name is given as "NEU1173H" on the CSFs and as "NEU1173H Concentrate" on the product label.

1c. Deficiency # 5: The method for determining the pH should be provided.

1d. Deficiency #6: Oxidation/reduction and chemical incompatibility should be addressed.

1e. Deficiency # 7: Results from one-year storage stability and corrosion characteristics testing should be provided.

2. Toxicity. Product toxicity data are acceptable.

3. Non-target organisms' data are acceptable, except for non-target plant data, which has not been submitted. The only available phytotoxicity data on grasses is found in Product Performance study (OPPTS 810.3400).

3a. Deficiency # 1: The effect of the proposed product on non-target plants needs to be addressed (OPPTS 850.4000). The registrant needs to submit non-target plant data or rationale for justifying a data waiver request from the requirement of OPPTS 850.4000.

4. Environmental fate: The literature summary of environmental fate data for Fe HEDTA is acceptable pending additional information on hydrolysis, and adsorption/desorption of NEU1173H in soils.

4a. Deficiency # 1: The registrant should provide information on hydrolysis, and adsorption/desorption of NEU1173H in soils in order to completely fulfill the guidelines requirements of OPPTS 835 series.

Endangered Species Assessment for iron HEDTA: Based on the chemical similarities between iron HEDTA and iron EDTA, available data for iron EDTA and similar iron chelates indicate that adverse effects on threatened and endangered species are unlikely.

4. Product Performance. Overall, the data shows that the product is effective against its target plants, and phytotoxicity to most grasses is minimal. However, study is deficient in maintaining application rates and times of re-applications consistent with label recommendations. The study is classified as supplemental.

Note to RAL: Product chemistry is also been reviewed by Nina Simeonova in a separate memo dated May, 16, 2008.

STUDY SUMMARIES

Introduction

The product, NEU1173H, containing iron HEDTA as its sole active ingredient, is intended for use as a herbicide, algacide and mossicide for household (residential) uses on lawns, and commercial (terrestrial non-food) on rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. Iron HEDTA has a lethal but non-toxic mode of action, oxidative damage. Iron HEDTA and other similar chelates like Fe EDTA have been applied as liquid fertilizers in soil and foliar applications for many years to address micronutrient deficiencies in plants. Iron HEDTA is not found in toxic/hazardous substance databases (e.g. HSDB, NIOSH, IARC, NTP or OSHA). It is listed as a high production volume (HPV) chemical.

Product Chemistry

TABLE 1. Nominal CSF concentrations and certified limits for NEU1173H (alternate formulation) ^a					
Ingredients (CAS number)	PC Code	Purpose	Concentration (% by weight)		
			Nominal	Lower	Upper
Active Ingredient					
Iron HEDTA (CAS No. 17084-02-5)	Not found	Active ingredient	(26.52)	(25.72)	(27.32)
Inert Ingredients					

^aData from CSF

Contains Confidential Business Information (if app.)

Contains Confidential Business Information (CBI)

TABLE 2. Nominal CSF concentrations and certified limits for NEU1173H (basic formulation) ^a					
Ingredients (CAS number)	PC Code	Purpose	Concentration (% by weight)		
			Nominal	Lower	Upper
Active Ingredient					
Iron HEDTA (CAS No. 17084-02-5)	Not found	Active ingredient	26.52	25.72	27.32
Inert Ingredients					

^aData from CSF

^bCAS No. omitted on CSF

* corrected in DER by first reviewer.

Contains Confidential Business Information (if app.)

TABLE 3. Physical and Chemical Properties for NEU1173H*

Guideline Reference No./Property		Description of Result	Methods
830.6302	Color	Deep red	Visual inspection
830.6303	Physical State	Liquid at room temperature	Visual inspection
830.6304	Odor	Odorless	Olfactory inspection
830.6313	Stability	Not required for EP.	
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not addressed	
830.6315	Flammability	Not applicable, the product does not contain any combustible ingredients	Product knowledge
830.6316	Explosibility	Not applicable, the product does not contain any combustible ingredients	
830.6317	Storage Stability	No change in iron HEDTA content when stored for one month at 50°C	Based on CIPAC MT 46
830.6319	Miscibility	Not applicable, the product is not to be mixed with petroleum solvents. Miscible with water in all proportions.	
830.6320	Corrosion Characteristics	No evidence of corrosive effects on HDPE bottles or caps after one month of storage at 50°C.	
830.6321	Dielectric Breakdown Voltage	Not applicable, the product is not for use around electrical equipment.	
830.7000	pH	6.50 ± 0.50	
830.7050	UV/Visible Absorption	Not required for EP.	
830.7100	Viscosity	6 cPs at 30 rpm 11.5 cPs at 60 rpm 4 cPs at 30 rpm Measured with spindle LV1 after one minute at 20°C	Brookfield LVF viscometer
830.7200	Melting Range	Not applicable, product is a liquid.	
830.7220	Boiling Range	Not required for EP.	
830.7300	Density/Relative Density/Bulk Density	Density is 1.29 g/mL at 20°C	CIPAC MT 159
830.7370	Dissociation Constant in Water	Not required for EP.	
830.7550	Partition Coefficient	Not required for EP.	
830.7840	Water Solubility	Not required for EP.	
830.7950	Vapor Pressure	Not required for EP.	

*Data from MRID 47207403

Toxicity

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Acute Oral Toxicity/OPPTS 870.1100	> 5000 mg/kg	IV	472074-04
Acute Dermal Toxicity/OPPTS 870.1200	> 5000 mg/kg	IV	472074-05
Acute Inhalation Toxicity/OPPTS 870.1300	> 5.43 mg/L	IV	472074-06
Acute Eye Irritation/OPPTS 870.2400	Mildly irritating	IV	472074-07
Acute Dermal Irritation/OPPTS 870.2500	Non-irritating	IV	472074-08
Skin Sensitization/OPPTS 870.2600	Not skin sensitizer	IV	472074-09

Exposure

Dietary Exposure and Risk Characterization: N/A The product is non-food use

Occupational, Residential, School and Day-Care Exposure and Risk Characterization:
Precautionary statements and use directions on the label are adequate. Use directions provide instructions for avoiding direct contact with the product.

Drinking Water Exposure and Risk Characterization: Although contamination of drinking water is unlikely given the short life of iron chelates and the use pattern of the product, the registrant should provide information on hydrolysis, and adsorption/desorption of NEU1173H in soils in order to completely fulfill the guidelines requirements of OPPTS 835 series.

Acute and Chronic Dietary Risks for Sensitive Subpopulations Particularly Infants and Children:
N/A. The product is non-food use.

Aggregate Exposure: N/A. The product is non-food use.

Cumulative Effects: Bioaccumulation is unlikely. Iron chelates biodegrade rapidly under natural conditions.

Non-Targets

<u>Study Type/OPPTS Guideline</u>	<u>LD₅₀/LC₅₀/Results</u>	<u>Toxicity Category</u>	<u>MRID</u>
Avian Acute Oral/OPPTS 850.2100	> 2000 mg/kg bw	Practically non-oxic	47207410
Avian Dietary/OPPTS 850.2200	> 5,000 ppm	Practically non-toxic	47233001
Freshwater Fish LC50/OPPTS 850.1075	96-hr > 100 mg/L	Practically non-toxic	47233002
Freshwater Invertebrate/OPPTS 850.1010	48 hr > 100 mg/L	Practically non-toxic	47233003
Non-target Plants/OPPTS 850.4000	* Not submitted		
Non-target Insects Honey Bee Acute Oral & Contact Toxicity. LD50/OPPTS 850.3020	Oral: 83.7 µg a.i./bee Contact: 48 hr > 100 µg a.i./bee	Toxic Practically non-toxic	47233004
Efficacy data	Minimal grass injury <5% to 20%	Minimal phytotoxicity on grasses.	472074-16

- *The registrant states in MRID47207416 for Product Performance study that “Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period (42 days post-application).”*

Environmental fate: Iron HEDTA is chemically very similar to ferric EDTA and thus the 2 chelates follow the same pathways of degradation, photodegradation and microbial degradation in waste water, sediments and soils. Due to this chemical similarity, the degradation of the two chelates is very similar. According to Sykora et al. (2001) biological degradation of ethylenediamine-based complexing agents decreases in order of the following substitutes: -COOH₃, -CH₃, -C₂H₅, -CH₂CH₂OH and -CH₂COOH suggesting that HEDTA may be more susceptible to degradation than EDTA. Ferric complexes of EDTA, HEDTA and DTPA are decomposed on exposure to daylight (Hill-Cottingham, 1995). The half-life of ferric EDTA is calculated between 11.3 min to more than 100 h for surface waters containing Fe(III)EDTA (Frank and Rau, 1989; Kari et al, 1995; Svenson et al., 1989). The differences observed in the half-life rates are likely due to differences in light conditions of the experiments. The wavelength of light that is required to photodegrade Fe(III)EDTA is the fraction of sunlight below 400 nm (i.e. in the UV range) (Bucheli-Witschel and Egli, 2001). The rate of photodegradation is also dependent on pH but at measured pH 4 and 8, Fe(III)EDTA was completely degraded in 24 and 32 hours (Lockhart, 1975). Ferric EDTA degrades to ED3A, EDDA-N,N', EDDA-N,N, EDMA, IMDA, glycine and formaldehyde all of which are biodegradable (Metsarinne, 2001). Microbial degradation of ferric EDTA has been documented

in numerous studies. In a mixed culture of microorganisms (genus *Methylobacterium*, *Variovarax*, *Enterobacter*, *Aureobacterium* and *Bacillus*) 60% of Fe(III)EDTA was degraded (Bucheli-Witschel, 2001). Ninety percent degradation of ferric EDTA was achieved with a pure culture of *Agrobacterium* sp. (Lauff, 1990). Ferric EDTA was microbially degraded in naturally occurring soils and sediments (Tiedje, 1975 and 1977). Likewise, ferric EDTA was degraded in mixed microbial populations collected from an aerated lagoon (Belly, 1974).

Endangered Species Assessment. Due to chemical similarity between iron HEDTA and Ferric EDTA, the biological effects of these chelates are comparable. Available information on the effects of iron in sodium ferric EDTA on non-target organisms indicates that the iron in these chelates interacts with the hemocyanin in the bloodstream of molluscs and crustaceans, and it would be toxic to mollusks and crustaceans. However, exposure to freshwater crustaceans or mollusks is not unlikely to occur given the intended use of this product as herbicide applied directly to terrestrial plants. Exposure to endangered or threatened terrestrial snails and crustaceans (isopods) is not expected since the currently listed endangered or threatened species pursuant to the Endangered Species Act of 1973, 16 U.S.C. 1531, et seq., are not found in locations where the product is intended for use; i.e., home lawns, rights-of-ways, golf courses, parks, playgrounds, cemeteries, and athletic fields. The habitats of currently listed as threatened or endangered mollusks and crustacean species range from isolated caves and streams to woods or forests.

Product Performance. "A series of greenhouse and field trials were conducted to evaluate the efficacy of NEU1173H (a.i., 26.52% w/w iron HEDTA) against a variety of weeds including dandelion, white clover, English daisy, creeping buttercup, black medick, chickweed, and moss. When applied at the label-recommended rate, the test material was effective against the tested weeds, and its efficacy increased when a second application was made 14 to 28 days after the first one. Lower application rates were less effective. Phytotoxicity to various grasses was normally minimal, and in the few tests where up to 20% of grass was affected, recovery was complete by the end of the test period."

The reviewer calculates that the application rate used in Test 1 (430 mL/m², calculated to be 460 gal/A) slightly exceeds the label recommended rate (5-10 gal/1000 ft², calculated to be 218 – 436 gal/A) for the handheld sprayer used in the test. The application rates in Tests 2 – 17 (200 or 400 mL/m²) are slightly below the recommended rate. In Tests 18 and 19, the reviewer calculates the application rates of 8.9, 17.7, and 26.6 mL/m² to be 9.5, 18.9, and 28.4 gal/A, respectively. The 18.9 gal/A rate slightly exceeds, and the 28.4 gal/A rate greatly exceeds, the label recommended rate of 1 gal/2500 ft² (calculated to be 17 gal/A) for the hose-end sprayers used in the test. Therefore the results for the 26.6 mL/m² rate should be discounted. When used at the recommended application rate, the test material was effective against a variety of weeds, and its efficacy increased when a second application was made (Tests 1, 2, 5, 12, and 19). The product label recommends a second application after three to four weeks. The second application in Tests

1, 2, and 5 was made after two weeks, and in Tests 12 and 19 after about four weeks. Phytotoxicity to grasses was normally minimal (<5%), although it reached 20% in one test. However, by the end of the test the grass had recovered. The application rates and re-application times do not coincide with those recommended on the label. For the most part, the study is representative of the use pattern and demonstrates the performance of the product, but in order to support label recommendations, the test should have been done accordingly to label instructions.

REFERENCES.

- Belly, R.T., J.J. Lauff and C.T. Goodhue. 1975. Degradation of ethylenediaminetetraacetic acid by microbial populations from an aerated lagoon, *Appl. Env. Micro.*, Vol. 29, No. 6 p. 787-794.
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- Lockhart, H.B. Jr. and R.V. Blakeley. 1975. Aerobic photodegradation of Fe(III)-ethylenedinitrilotetraacetate (ferric EDTA). *Env. Sci. Technol.* 9:1035-1038.
- Metsarinne, S., T. Tuhkanen, R. Aksela. 2001. Photodegradation of ethylenediaminetetraacetic acid (EDTA) and ethylenediamine dissuccinic acid (EDDS) within natural UV radiation range. *Chemosphere*, 45: 949-955.
- Svenson, A., L. Kaj and H. Bjorndal. 1989. Aqueous photolysis of the Iron (III) complexes of NTA, EDTA and DTPA. *Chemosphere*, Vol. 18, Nos. 9/10, pp. 1805-1808.
- Sykora, V., P. Pitter, I. Bittnerova and T. Lederer. 2001. Biodegradability of ethylenediamine-based complexing agents. *Wat. Res.* 35:2010-2016.
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Tiedje, J.M. 1977. Influence of environmental parameters on EDTA biodegradation in soils and sediments. J. Env. Qual. Vol. 6, No. 1, 21-26.

cc: Clara Fuentes, RAL Driss Benmhend, BPPD Chron File, IHAD/ARS
Reviewer name, FT, PY-S: date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

DATE: May 16, 2008

SUBJECT: Science Review in Support of the Registration of NEU 1173H containing 26.52 % Ferric HEDTA, a new active ingredient.

Decision Number:	382585
DP Number:	345543
EPA File Symbol Number:	67702-EA
Chemical Class:	conventional chemical (metal complex)
PC Code:	Not yet assigned
CAS Number:	17084-02-5
Active Ingredient Tolerance Exemptions:	N/A
MRID Numbers:	472074-01, 742074-02, 472074-03

FROM: Nina Simeonova, Chemist, NOWCC - SEE *N. Simeonova*
Biopesticides & Pollution Prevention Division (7511P)

TO: Driss Benmhend, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THE FOLLOWING CONTAINS CONFIDENTIAL BUSINESS INFORMATION

ACTION REQUESTED

On behalf of Neudorff GmbH KG the authorized agent Walter Talarek requests registration of the end-use product NEU1173H, EPA File Symbol 67702-EA (basic and alternate formulation) containing 26.5 % of the new active ingredient Ferric HEDTA.

NEU1173H is a non- food use herbicide for commercial and residential areas. The basic formulation of NEU1173H is produced by [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Manufacturing process information may be entitled to confidential treatment

[REDACTED] The alternate formulation is produced by [REDACTED]
[REDACTED]
[REDACTED]

In support of the request the registrant has submitted product chemistry data in MRIDs 472074-01, 472074-02 and 472074-03, draft basic and alternate CSFs dated 08/10/07 (pin-punched 08/15/2008) and draft label.

RECOMMENDATIONS AND CONCLUSIONS

Product chemistry data are unacceptable, but upgradeable. To upgrade them to acceptable it is necessary:

- To submit description of the production process for the alternate product in compliance with the requirements of 40CFR§158.165, because the basic and alternate formulations are produced by different methods;
- To use self-proposed certified limits of the active ingredient in the basic CSF in compliance with the provisions of 40CFR§158.175(c) in order to assure consistency of the CSF with the results of the preliminary analysis;
- To correct the CAS # for [REDACTED] and to add the CAS # for [REDACTED] in the basic and the alternate CSFs;
- The upper certified limit for the source of the active ingredient [REDACTED] in the alternate formulation does not need correction. It is in compliance with 40CFR§158.175(b) (2) and the value [REDACTED] means that the source of the active ingredient can be over-weighted by [REDACTED] of its nominal value;
- To address the effect on the overall hazardous properties of NEU1173H of the manufacturing impurity [REDACTED]. This impurity is carried -over in the alternate formulation through [REDACTED]. [REDACTED] is not present in the basic formulation and is known to be under toxicological concern;
- To provide data about the property Oxidation/Reduction & Chemical Incompatibility because the product contains [REDACTED];
- It is recommended to comment the purpose of [REDACTED] in the formulations because these ingredients are [REDACTED].
[REDACTED]

It is recommended to allow bridging of data from the accelerated Storage Stability and Corrosion tests to the long term Storage Stability and Corrosion at normal storage conditions on the base of the recommendations in CIPAC MT 46.

STUDY SUMMARIES

MRID 472074-01. NEU1173H End-Use Product. Product Chemistry. Product Identity and composition. The study contains CBI. It is not subject to the requirements of 40CFR§160. In Confidential Attachment it contains description of the active ingredient FeHEDTA by chemical name, molecular and structural formula. The compositions of the basic and the alternate

formulations are provided in Table 1 and table 2. During the production of the basic formulation the [REDACTED] and is identified as manufacturing impurity. The starting materials are identified by chemical name, trade name CAS # and supplier. [REDACTED]

[REDACTED] The steps of the production process of the basic formulation are described and supported by flow-chart. The equipment and the conditions of the process are described. The analytical method is HPLC with external standard and UV-detection. The validation is provided in MRID 472074-03. Appendix 1 contains MSDSs of the starting materials. The study is unacceptable, but upgradeable.

MRID 472074-02. NEU1173H End-Use Product. Product Chemistry. Analysis and Certification of Product Ingredients. The study contains CBI. It is conducted in compliance with the requirements of 40CFR§160. In Confidential Attachment it contains the Certification Statement required by 40CFR§158.175(e). 5 samples of the final product, not identified by Batch Numbers are analyzed by the validated procedure already described in MRID 472074-02. The analytical results are treated statistically. The RSD is 0.97 %, the recovery is 96.78 %. The results for Sample 1 and Sample 2 are outside the certified limits provided in the basic CSF. Supporting chromatograms are attached. The study is unacceptable, but upgradeable.

MRID 472074-03. NEU1173H End-Use Product. Product Chemistry. Physical and Chemical Characteristics. The study does not contain CBI. It is conducted in compliance with the requirements of 40CFR§160. The physical properties Color, Odor, Density, pH, Flammability, Viscosity and Miscibility are determined. The Storage Stability and Corrosion Characteristics are tested for one month at 50-54°C in accelerated procedure described in CIPAC Handbook as Protocol No. MT 46. The product lost approximately 4 % of the initial concentration of the active ingredient under the test conditions. No damage of the packaging material occurred. The protocol states that if a product passes the accelerated test, it will not fail in the long term studies under normal storage conditions. The study is acceptable.

cc: N. Simeonova, D. Benmhend, BPPD Chiron File, IHAD/ARS
N. Simeonova, FT, PY-S: 05/16/2008.

Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0080. Approval expires 2-28-



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

036

Application for Pesticide - Section I

1. Company/Product Number 67702- EA	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) NEU1173H	PM# 92	
5. Name and Address of Applicant (Include ZIP Code) W. Neudorff GmbH KG c/o Walter G. Talarek PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.) Neudorff submits that the appropriate PRIA fee category and fee are B60 and \$15,750, respectively. This is a new end-use product containing a new active ingredient. The product will be reviewed by the Biopesticides and Pollution Prevention Division. Further, the product is for non-food uses. Thus, this is a "New AI Non-food use". Please note that an application for registration of the ready-to-use version of this product also is being submitted today, and the \$15,750 PRIA fee should cover both products. You may contact Neudorff's authorized agent by fax at 703-759-5548 or e-mail at envlaw@bonzai.net.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16, 24 & 32 oz; 1, 2.5, 5, 10, 20, 40, 45, 50 & 200 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Walter G. Talarek		Title Authorized Agent	
		Telephone No. (Include Area Code) 703-759-4837	
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>			
2. Signature 		3. Title Authorized Agent	
4. Typed Name Walter G. Talarek		5. Date August 10, 2007	
		6. Date Application Received (Stamped)	

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LAW OFFICES OF
WALTER G. TALAREK, P.C.
1008 RIVA RIDGE DRIVE
GREAT FALLS, VIRGINIA 22066

PHONE: (703) 759-4837
FAX: (703) 759-5548

August 10, 2007

DELIVERED BY COURIER
CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Linda Hollis
Product Manager *92 91*
Biopesticides and Pollution Prevention Division
c/o Document Processing Desk (REGFEE)(APPL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: Application for Registration of NEU1173H; Contains New Active Ingredient

Dear Ms. Hollis:

Please find enclosed W. Neudorff GmbH KG's ("Neudorff's") application for registration of its "NEU1173H" selective herbicide. This product contains iron HEDTA as the sole active ingredient. Iron HEDTA is a new active ingredient. NEU1173H is an herbicide, algaecide and mossicide for commercial (terrestrial non-food) and household (residential) uses. The commercial use product is for use on lawns, turf (non-food uses and rights-of-way), golf courses, parks, playgrounds, cemeteries, and athletic fields. The household product is for use on lawns. The product is applied by standard hand-held, hose-end or backpack sprayers.

In a letter dated May 18, 2006, Dr. Russ Jones informed me that the Biochemical Classification Committee had recommended that the active ingredient be classified as "Not a Biochemical", but eligible for a reduced data set and reviewable by the Biopesticides and Pollution Prevention Division. This recommendation was based on: (1) ferric HEDTA is not naturally-occurring; and (2) ferric HEDTA has a lethal, but non-toxic mode of action (oxidative damage) against target pests.

Representatives of Neudorff met with your staff and you on October 26, 2006, to discuss the registration of this product. The guidance received was that Tier I data are applicable to the product's registration, and because the active ingredient is produced as part of an integrated production process, the data requirements that apply to the technical grade of the active ingredient should be addressed by data developed on the concentrated end-use product.

Neudorff is using the selective method of support to support the registration of this product. With regard to the generic product chemistry and toxicology data requirements applicable to iron HEDTA, Neudorff is requesting waivers or explains why a requirement is inapplicable. See the enclosed Data Matrix, EPA Form 8570-35, and the "Correspondence Document: Explanations and Waiver Requests" for details. With regard to the generic ecotoxicity data requirements, Neudorff is submitting data. In addition, with regard to the environmental fate of the active ingredient, Neudorff is submitting a compendium of data which address its fate, transport, and transformation. For the applicable product-specific, product performance, product-chemistry and acute toxicology data requirements, Neudorff is submitting data.

Neudorff submits that the appropriate PRIA fee category and fee for this product are B6C and \$15,750, respectively. Neudorff's NEU1173H is a new product with a new active ingredient for non-food use.

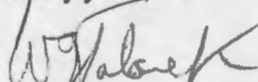
Further, please note that on this day, Neudorff also is submitting an application for registration of the ready-to-use version of this product, which is named "NEU1173H RTU". Based on a communication with Mr. Steve Morrill of EPA, Neudorff's understanding is that the \$15,750 fee will cover both applications for registration.

Because this is the first product containing iron HEDTA as an active ingredient that is being registered with EPA, Neudorff requests that, under FIFRA section 3(c)(1)(F), EPA designate and treat the data being submitted with this application as "exclusive use data". Neudorff requests that EPA place its name on the Data Submitters List for iron HEDTA and designate by its name that its data are exclusive use data.

The product's master label is divided into eight sub-labels: four for the commercial uses; and the other four for the household uses. Five (5) copies of the product's proposed label are enclosed for your review.

Please feel free to contact me if you have any questions about this application.

Sincerely yours,



Walter G. Talarek
Authorized Agent
W. Neudorff GmbH KG

Enclosure – Application for Registration

TRANSMITTAL DOCUMENT

1. Name and address of submitter

W. Neudorff GmbH KG
c/o Walter G. Talarek, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

2. Regulatory action in support of which this package is submitted

Application for registration of NEU1173H


3. Transmittal date

August 10, 2007

4. List of submitted studies

Volume 1	Administrative Materials
Volume 2	Product Chemistry: Product Identity and Composition
Volume 3	Product Chemistry: Analysis and Certification of Product Ingredients
Volume 4	Product Chemistry: Physical and Chemical Characteristics
Volume 5	Acute Oral Toxicity; OPPTS 870.1100
Volume 6	Acute Dermal Toxicity; OPPTS 870.1200
Volume 7	Acute Inhalation Toxicity; OPPTS 870.1300
Volume 8	Primary Eye Irritation; OPPTS 870.2400
Volume 9	Primary Dermal Irritation; OPPTS 870.2500
Volume 10	Skin Sensitization; OPPTS 870.2600
Volume 11	Avian Acute Oral Toxicity; OPPTS 850.2100
Volume 12	Avian Dietary Toxicity; OPPTS 850.2200
Volume 13	Fish Acute Toxicity; OPPTS 850.1075
Volume 14	Aquatic Invertebrate Acute Toxicity; OPPTS 850.1010
Volume 15	Honeybee Acute Contact Toxicity; OPPTS 850.3020
Volume 16	Fate, Transport and Transformation; OPPTS Guideline Series 835
Volume 17	Product Performance; OPPTS Guideline Series 810

Company Official: Walter G. Talarek
Authorized Agent


Signature

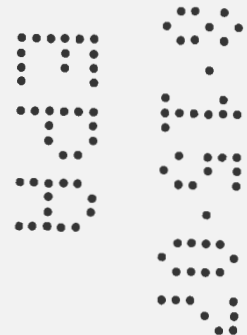
Company Name: W. Neudorff GmbH KG

Company Contact: Walter G. Talarek
Name

(703) 759-4837
Phone

TABLE OF CONTENTS

1. Letter to Ms. Linda Hollis, Product Manager, Team 92, explaining the application
2. Application for Registration; EPA Form 8570-1
3. Confidential Statement of Formula (CSF) – Basic Formulation; EPA Form 8570-4
4. Confidential Statement of Formula (CSF) – Alternative Formulation; EPA Form 84570-4
5. Certification with Respect to Citation of Data; EPA Form 8570-34
6. Data Matrix (Product-Specific); EPA Form 8570-35 (Agency Copy)
7. Data Matrix (Product-Specific); EPA Form 8570-35 (Public-Use Copy)
8. Data Matrix (Generic); EPA Form 8570-35 (Agency Copy)
9. Data Matrix (Generic); EPA Form 8570-35 (Public-Use Copy)
10. Label (5 copies)
11. Correspondence Document: Explanations and Waiver Requests
12. Letter authorizing registration agent





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number W. Neudorff GmbH KG 1008 Riva Ridge Dr. 22066-1620	Great Falls, VA EPA Registration Number/File Symbol 67702-
Active Ingredient(s) and/or representative test compound(s) Iron HEDTA	Date August 10, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial nonfood; Domestic outdoor	Product Name NEU1173H

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

W. Talarek

Date

8/10/07

Typed or Printed Name and Title
Walter G. Talarek
Authorized Agent

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

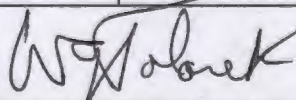
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DATA MATRIX (Product-Specific)

Date August 10, 2007	EPA Reg. No./File Symbol 67702-	Page 1 of 2
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany		Product NEU1173H

Ingredients – Iron HEDTA

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 810	Product Performance		67702	OWN	
830.1550	Product identity and composition		67702	OWN	
830.1600	Descrip. of mtls. used to produce product		67702	OWN	
830.1620	Description of production process		67702	OWN	
830.1670	Discussion of formation of impurities		67702	OWN	
830.1700	Preliminary analysis		67702	OWN	
830.1750	Certified limits		67702	OWN	
830.1800	Enforcement analytical method		67702	OWN	
830.6302	Color		67702	OWN	
830.6303	Physical state		67702	OWN	
830.6304	Odor		67702	OWN	
830.6317	Storage stability		67702	OWN	
830.6319	Miscibility		67702	OWN	
830.6320	Corrosion characteristics		67702	OWN	
830.7000	pH		67702	OWN	

Signature 	Name and Title Walter G. Talarek Authorized Agent	Date 8/10/07
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WASHINGTON, D.C. 20460

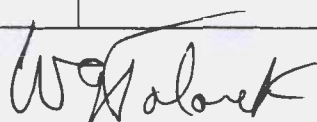
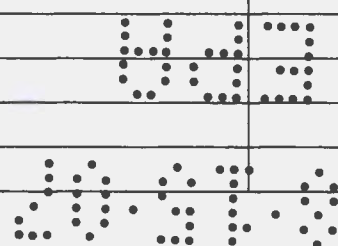
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DATA MATRIX (Product Specific)

Date August 10, 2007	EPA Reg. No./File Symbol 67702-	Page 2 of 2
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany	Product NEU1173H	

Ingredients – Iron HEDTA


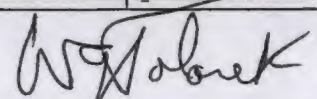
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity		67702	OWN	
830.7300	Density, bulk density or specific gravity		67702	OWN	
870.1100	Acute oral toxicity		67702	OWN	
870.1200	Acute dermal toxicity		67702	OWN	
870.1300	Acute inhalation toxicity		67702	OWN	
870.2400	Acute eye irritation		67702	OWN	
870.2500	Acute dermal irritation		67702	OWN	
870.2600	Skin sensitization		67702	OWN	
Signature	 		Name and Title Walter G. Talarek Authorized Agent	Date 8/10/07	

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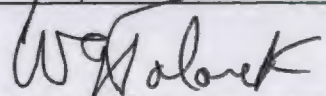
Date August 10, 2007		EPA Reg. No./File Symbol 67702-		Page 1 of 2	
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany		Product NEU1173H			
Ingredients - Iron HEDTA					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			67702	OWN	
			67702	OWN	
Signature 		Name and Title Walter G. Talarek Authorized Agent		Date 8/10/07	

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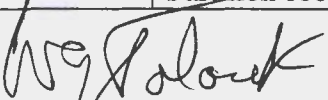
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Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany		Product NEU1173H			
Ingredients - Iron HEDTA					
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			67702	OWN	
			67702	OWN	
			67702	OWN	
			67702	OWN	
			67702	OWN	
			67702	OWN	
			67702	OWN	
Signature 			Name and Title Walter G. Talarek Authorized Agent		Date 8/10/07

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DATA MATRIX (Generic)

Date August 10, 2007			EPA Reg. No./File Symbol 67702-		Page 1 of 2
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany			Product NEU1173H		
Ingredients- Iron HEDTA					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition				Waiver Request
830.1600	Descrip. of mtl. used to produce product				Waiver Request
830.1620	Description of production process				Waiver Request
830.1670	Discussion of formation of impurities				Waiver Request
830.1700	Preliminary analysis				Waiver Request
830.1750	Certified limits				Waiver Request
830.1800	Enforcement analytical method				Waiver Request
830.6302	Color				Waiver Request
830.6303	Physical state				Waiver Request
830.6304	Odor				Waiver Request
830.6313	Stability				Waiver Request
830.7000	pH				Waiver Request
830.7100	Viscosity				Waiver Request
830.7200	Melting point				Waiver Request
830.7300	Density, bulk density or specific gravity				Waiver Request
830.7370	Dissociation constant				Waiver Request
830.7550	Partition coefficient				Waiver Request
Signature 			Name and Title Walter G. Talarek Authorized Agent		Date 8/10/07

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Date August 10, 2007

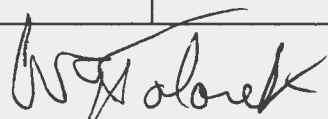
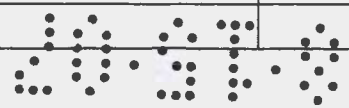
EPA Reg. No./File Symbol 67702-

Page 2 of 2

Applicant's/Registrant's Name & Address W. Neudorff GmbH KG
 An der Muhle 3
 D-31860 Emmerthal, Germany

Product NEU1173H

Ingredients -- Iron HEDTA

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Solubility				Waiver Request
830.7960	Vapor pressure				Waiver Request
OPPTS Series 835	Fate, transport and transformation		67702	OWN	
850.1010	Aquatic invertebrate acute toxicity		67702	OWN	
850.1075	Fish acute toxicity		67702	OWN	
850.2100	Avian acute oral toxicity		67702	OWN	
850.2200	Avian dietary toxicity		67702	OWN	
850.3020	Honey bee acute contact toxicity		67702	OWN	
870.1100	Acute oral toxicity		67702	OWN	Waiver Request
870.1200	Acute dermal toxicity		67702	OWN	Waiver Request
870.1300	Acute inhalation toxicity		67702	OWN	Waiver Request
Guideline 152-18	Immune response	44057801	67702	OWN	Waiver Request
OPPTS Series 870	Toxicity of iron phosphate	44057801	67702	OWN	
Signature 		Name and Title Walter G. Talarek Authorized Agent		Date 8/10/07	

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

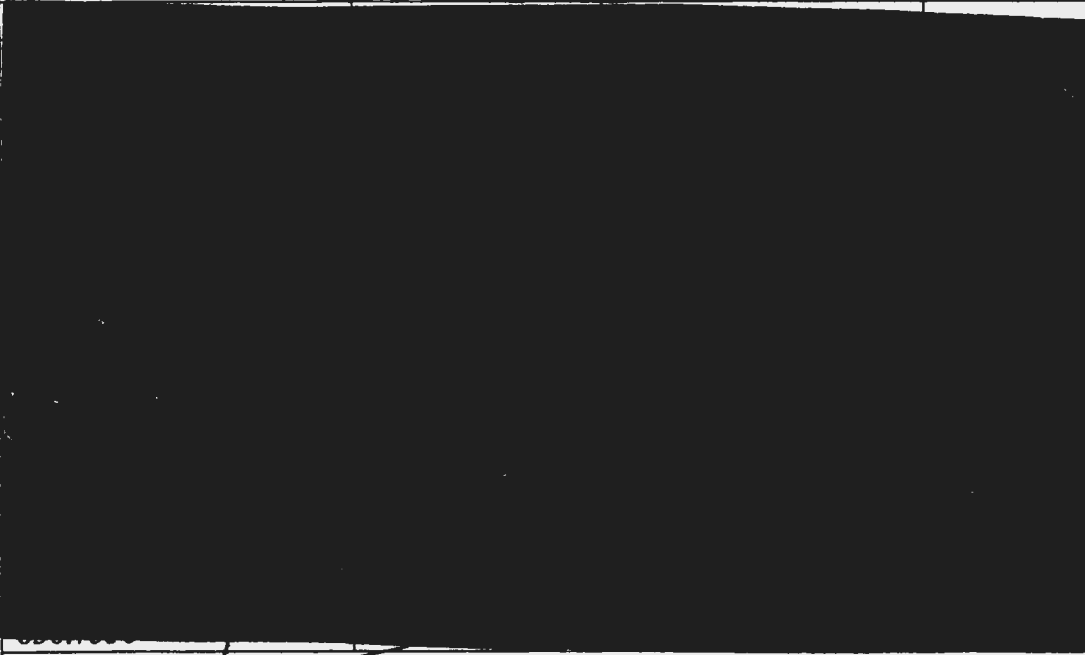

Agency Internal Use Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX (Generic)

Date August 10, 2007			EPA Reg. No./File Symbol 67702-		Page 1 of 2
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany			Product NEU1173H		
Ingredients- Iron HEDTA					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Waiver Request
					Waiver Request
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					Waiver Request
					Waiver Request
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					Waiver Request
Signature 			Name and Title Walter G. Balarek Authorized Agent		Date 8/10/07

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DATA MATRIX (Generic)

Date August 10, 2007	EPA Reg. No./File Symbol 67702-	Page 2 of 2
Registrant's/Registrant's Name & Address W. Neudorff GmbH KG An der Muhle 3 D-31860 Emmerthal, Germany	Product NEU1173H	

Ingredients - Iron HEDTA

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Waiver Request
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			67702	OWN	
			67702	OWN	
			67702	OWN	
			67702	OWN	
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			67702	OWN	Waiver Request
			67702	OWN	Waiver Request
			67702	OWN	
Signature	Name and Title Walter G. Talarak Authorized Agent			Date 8/10/07	

MASTER LABEL

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

SUBLABEL A: Household use on Weeds

SUBLABEL B: Household use on Weeds – Hose-end Sprayer

SUBLABEL C: Household use on Moss

SUBLABEL D: Household use on Moss – Hose-end Sprayer

SUBLABEL E: Commercial use on Weeds

SUBLABEL F: Commercial use on Weeds – Hose-end Sprayer

SUBLABEL G: Commercial use on Moss

SUBLABEL H: Commercial use on Moss – Hose-end Sprayer

EPA REG. NO. 67702-

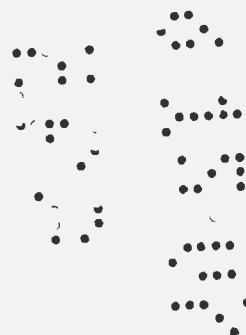
EPA EST. 67702-WG-1

KEEP OUT OF REACH OF CHILDREN CAUTION

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
D-31860 Emmerthal, Germany
www.neudorff.com

Household Use: NET CONTENTS: 16 ounces, 24 ounces, 32 ounces, 1 gallon

Commercial Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 10 gallons,
20 gallons, 40 gallons, 45 gallons, 50 gallons, 200 gallons



SUBLABEL A – HOUSEHOLD USE ON WEEDS**NEU1173H Concentrate****Active Ingredient:**

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%****KEEP OUT OF REACH OF CHILDREN****CAUTION**

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Can be used on new lawns (1 week) after grass emergence
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root

-Kills dandelions, down to the root

-(Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture

-(Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds

-People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL B – HOUSEHOLD USE ON WEEDS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

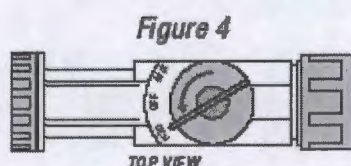
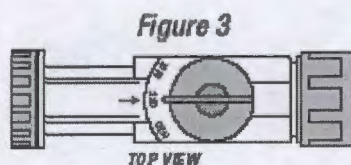
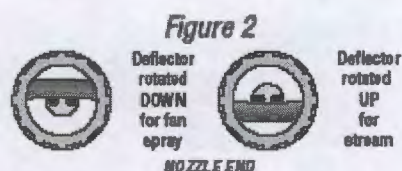
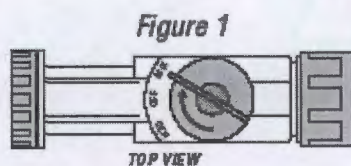
Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

**To Use This Sprayer:**

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

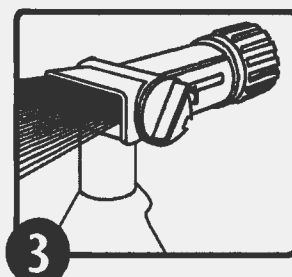
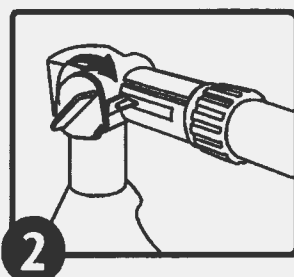
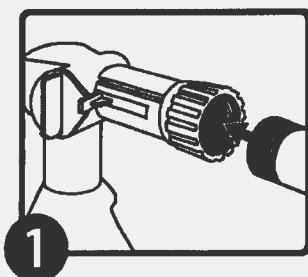
6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

OR

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

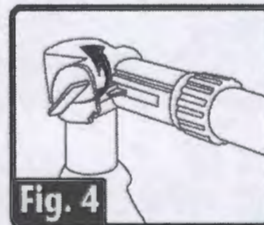
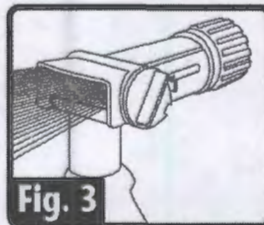
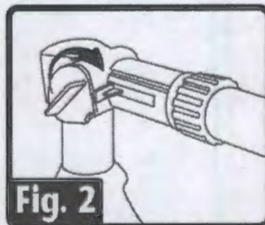
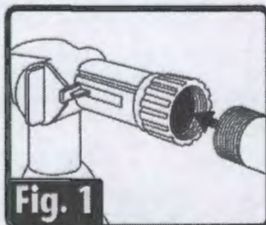
1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H₂O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



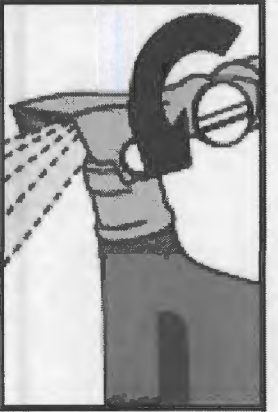


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,

- b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)

- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL C – HOUSEHOLD USE ON MOSS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 oz./yard²). Any standard hand-held or backpack sprayer can be used.

Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

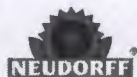
DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

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- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not

reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL D – HOUSEHOLD USE ON MOSS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

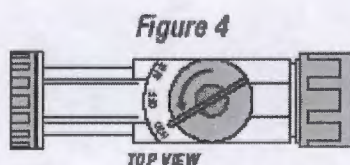
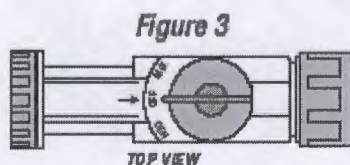
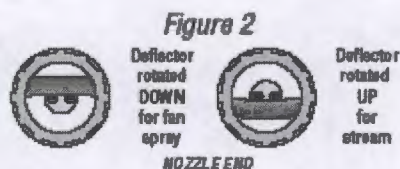
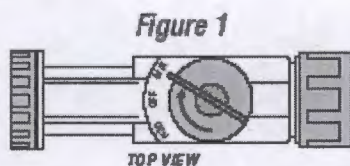
Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

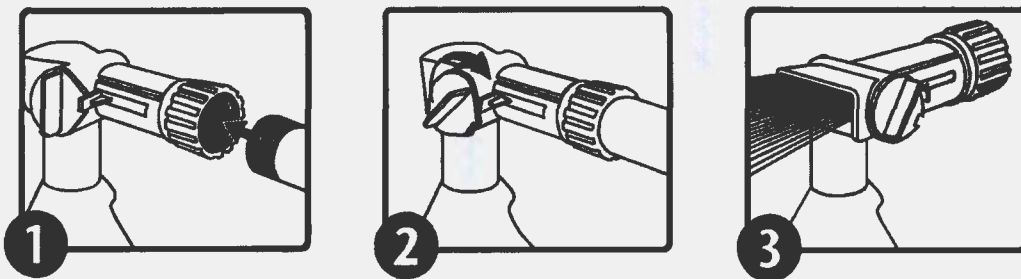
To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

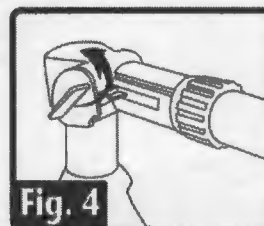
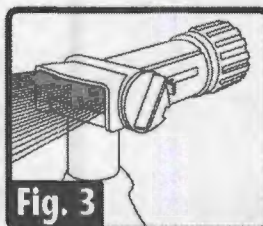
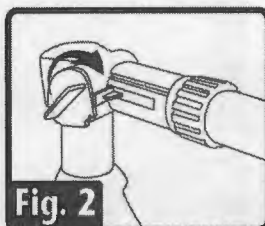
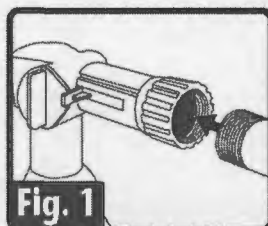


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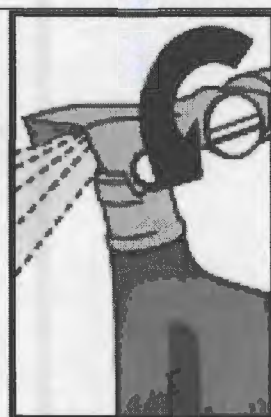
1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

hose, bend the safety tab back and turn dial "ON" until water stops spraying.

7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR



- Ensure that the large Water Control Knob is turned to the "OFF" position.
- Connect sprayer to garden hose.

- Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in.
- Turn on water at faucet.

- To spray, point nozzle where you want to spray and turn the large knob all the way to the left.
- To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet.
- **NOTE: BEFORE DISCONNECTING HOSE** (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again.
- Disconnect garden hose from sprayer.
- To prevent accidental discharge when not in use, turn the small Product Control Button so that it is NOT aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based

With the provided hose-end sprayer, this container will treat XXX ft²

NEU1173H

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- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with

applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL E – COMMERCIAL USE ON WEEDS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H –
insert product name]
- Eliminates unwanted moss, algae and lichens quickly

NEU1173H

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- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

Figure 1

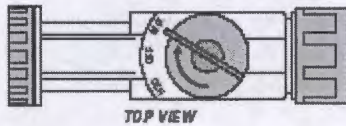


Figure 2

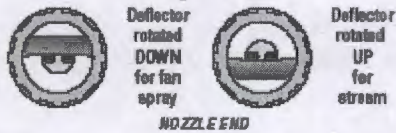


Figure 3

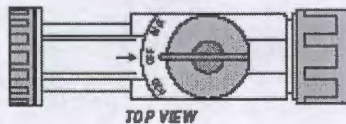
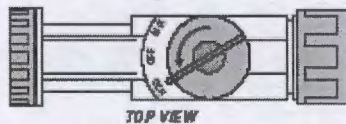


Figure 4



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

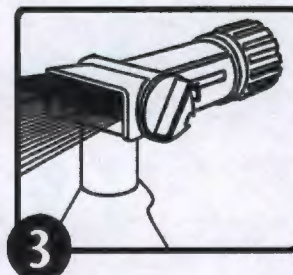
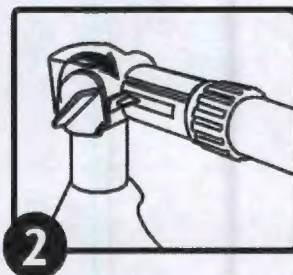
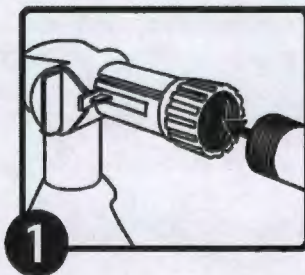
OR

1. Attach garden hose to spray nozzle. Turn on water supply.

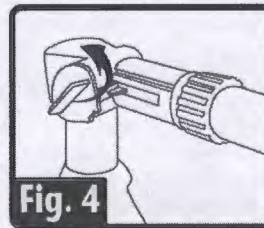
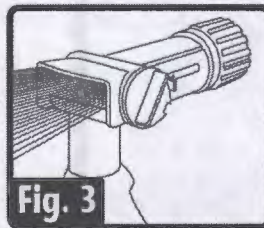
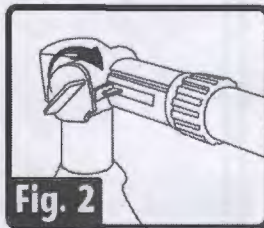
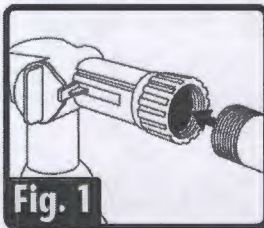
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.


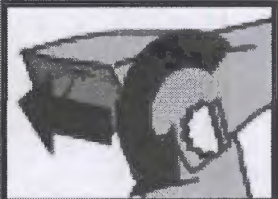
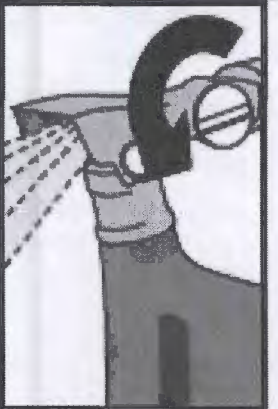
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective

- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	<ul style="list-style-type: none">-Hold eye open and rinse slowly and gently with water for 15-20 minutes.-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.-Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using.

Mix one part NEU1173H concentrate with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5

oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns

NEU1173H

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- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with

applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

SUBLABEL H – COMMERCIAL USE ON MOSS – HOSE-END SPRAYER

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

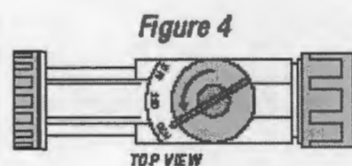
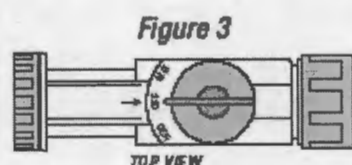
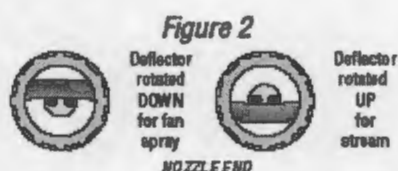
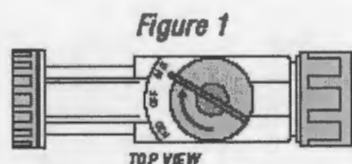
PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment if needed.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

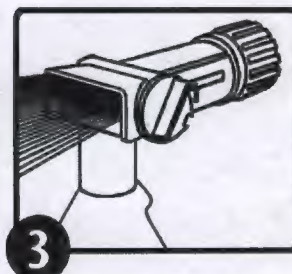
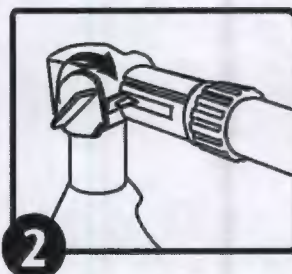
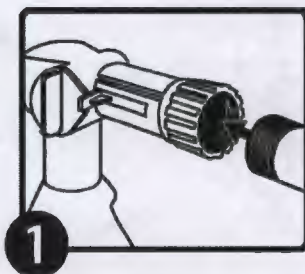
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

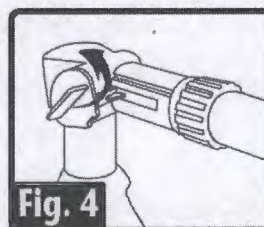
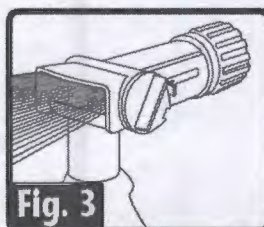
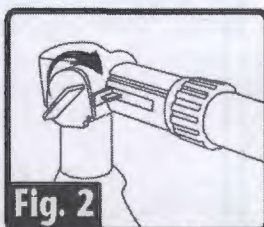
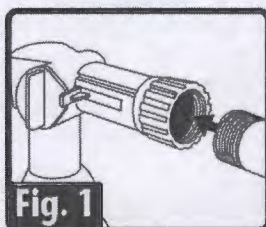


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

hose, bend the safety tab back and turn dial "ON" until water stops spraying.

7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR

<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

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- Lawn Moss Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use,

subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

MASTER LABEL

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

SUBLABEL A: Household use on Weeds

SUBLABEL B: Household use on Weeds – Hose-end Sprayer

SUBLABEL C: Household use on Moss

SUBLABEL D: Household use on Moss – Hose-end Sprayer

SUBLABEL E: Commercial use on Weeds

SUBLABEL F: Commercial use on Weeds – Hose-end Sprayer

SUBLABEL G: Commercial use on Moss

SUBLABEL H: Commercial use on Moss – Hose-end Sprayer

EPA REG. NO. 67702-

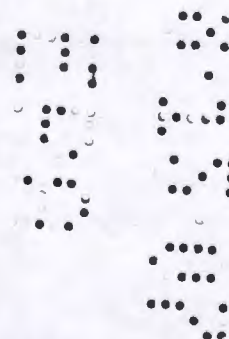
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**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
D-31860 Emmerthal, Germany
www.neudorff.com

Household Use: NET CONTENTS: 16 ounces, 24 ounces, 32 ounces, 1 gallon

Commercial Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 10 gallons,
20 gallons, 40 gallons, 45 gallons, 50 gallons, 200 gallons



SUBLABEL A – HOUSEHOLD USE ON WEEDS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

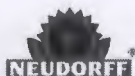
DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Can be used on new lawns (1 week) after grass emergence
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root

-Kills dandelions, down to the root

-(Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture

-(Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds

-People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL B – HOUSEHOLD USE ON WEEDS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

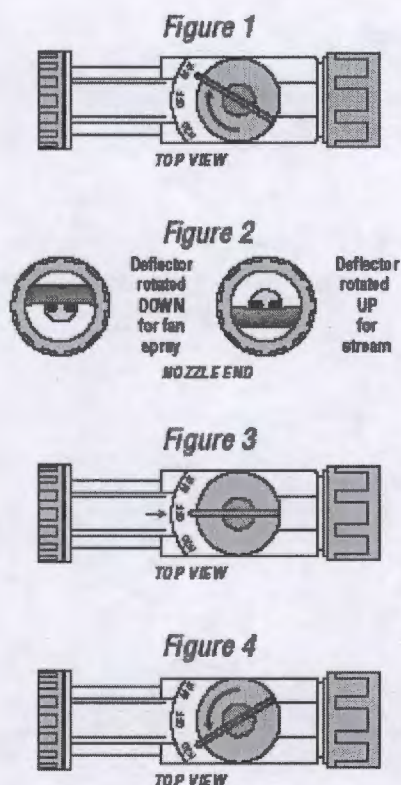
Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

**To Use This Sprayer:**

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

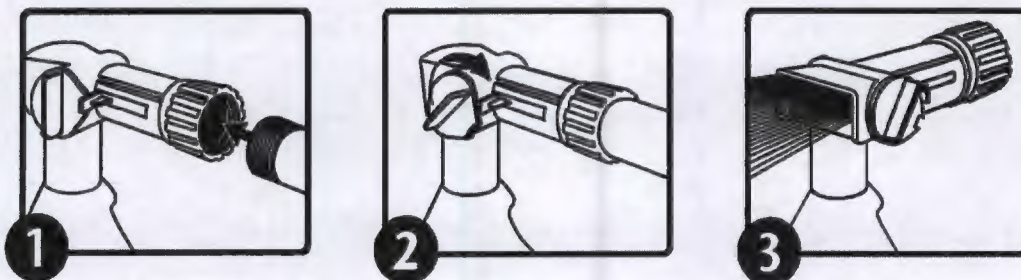
6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

OR

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

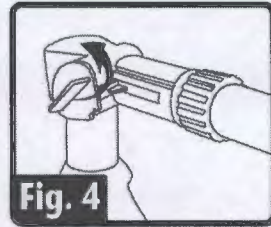
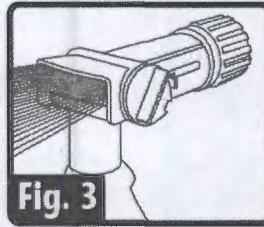
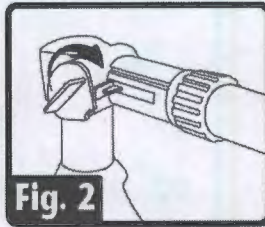
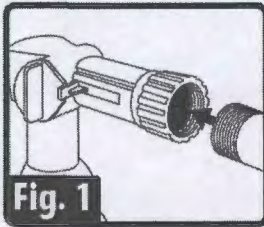
1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator


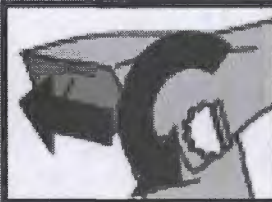
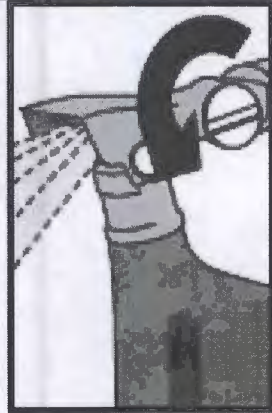


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,

- b. Using your other hand, **QUICKLY** turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To **STOP** spraying, **QUICKLY** turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To **STORE** unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

1

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

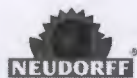
DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)

- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL C – HOUSEHOLD USE ON MOSS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 oz./yard²). Any standard hand-held or backpack sprayer can be used.

Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

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- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not

reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL D – HOUSEHOLD USE ON MOSS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

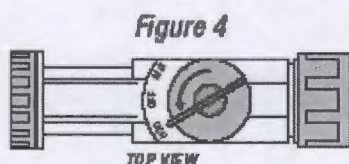
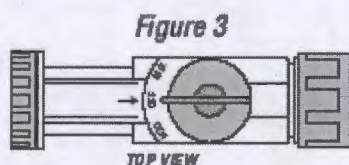
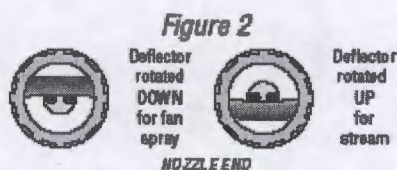
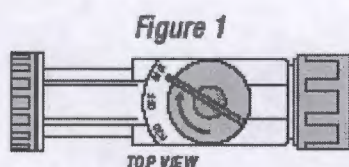
Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

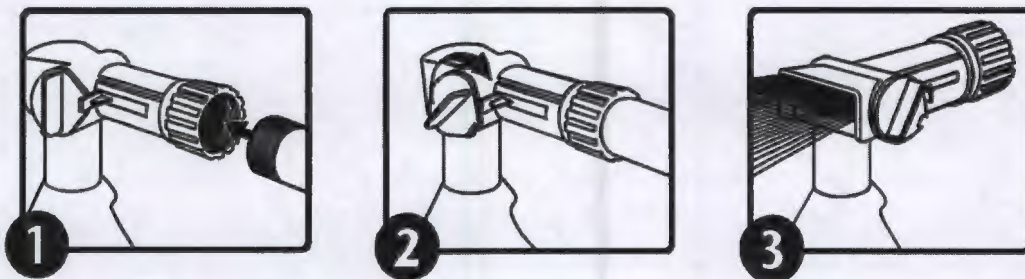
To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

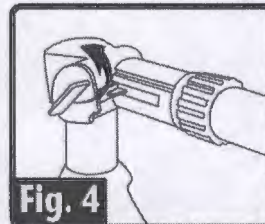
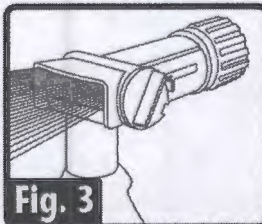
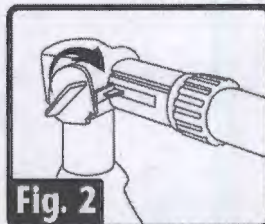
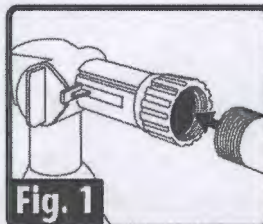
1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



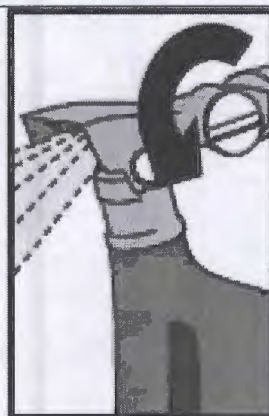
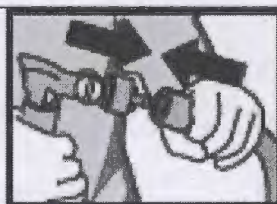
OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

- hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR



- Ensure that the large Water Control Knob is turned to the "OFF" position.
- Connect sprayer to garden hose.

- Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in.
- Turn on water at faucet.

- To spray, point nozzle where you want to spray and turn the large knob all the way to the left.
- To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet.
- NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again.
- Disconnect garden hose from sprayer.
- To prevent accidental discharge when not in use, turn the small Product Control Button so that it is NOT aligned with the tab and cannot be pushed in.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based

With the provided hose-end sprayer, this container will treat XXX ft²

NEU1173H

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- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with

applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL E – COMMERCIAL USE ON WEEDS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly

NEU1173H

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- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

Figure 1

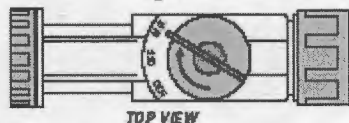


Figure 2

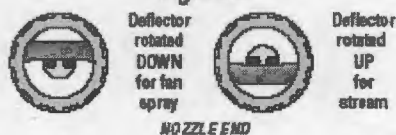


Figure 3

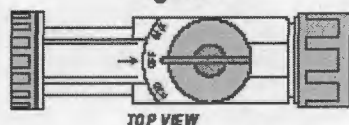
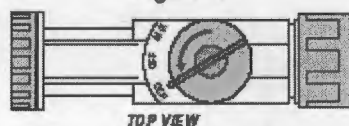


Figure 4



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)

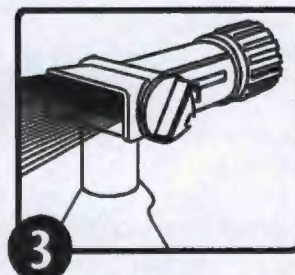
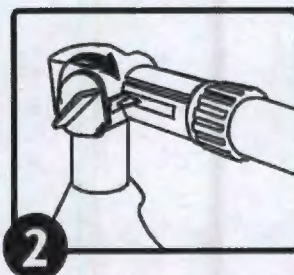
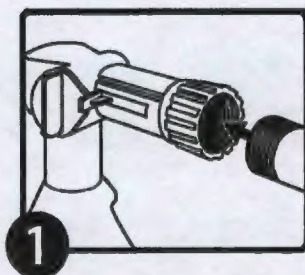
OR

1. Attach garden hose to spray nozzle. Turn on water supply.

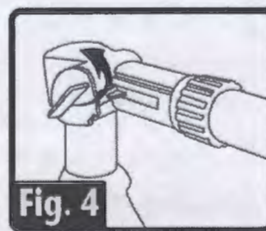
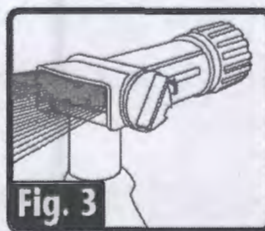
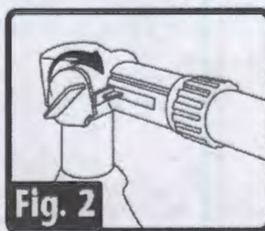
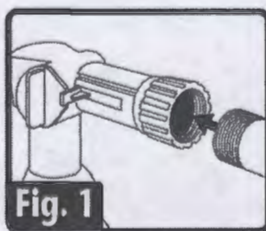
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.



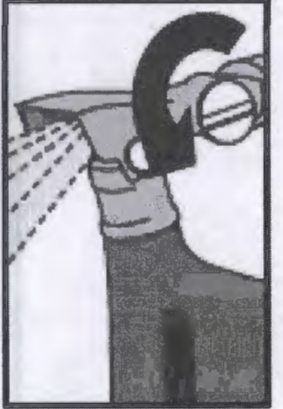
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective

- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%****KEEP OUT OF REACH OF CHILDREN****CAUTION**

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using.

Mix one part NEU1173H concentrate with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5

oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns

NEU1173H

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- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with

applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

SUBLABEL H – COMMERCIAL USE ON MOSS – HOSE-END SPRAYER

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

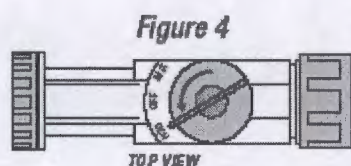
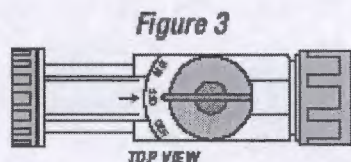
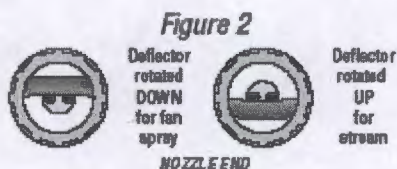
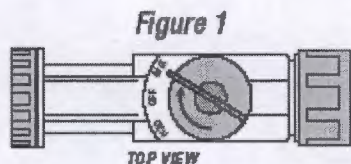
PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment if needed.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

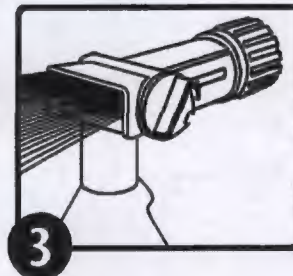
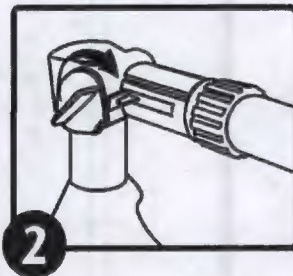
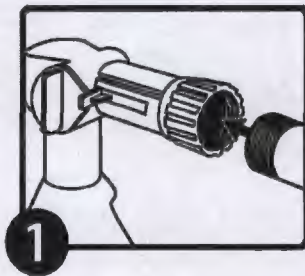
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

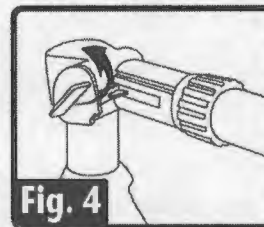
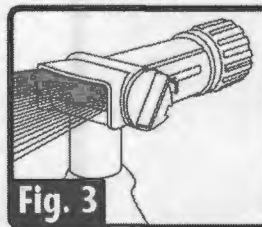
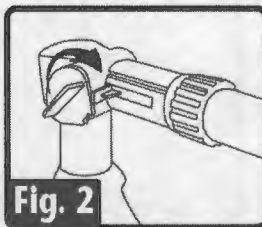
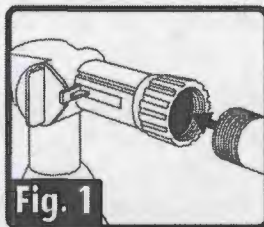


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

hose, bend the safety tab back and turn dial "ON" until water stops spraying.

7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR



- Ensure that the large Water Control Knob is turned to the "OFF" position.
- Connect sprayer to garden hose.

- Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in.
- Turn on water at faucet.

- To spray, point nozzle where you want to spray and turn the large knob all the way to the left.
- To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet.
- NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again.
- Disconnect garden hose from sprayer.
- To prevent accidental discharge when not in use, turn the small Product Control Button so that it is NOT aligned with the tab and cannot be pushed in.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

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- Lawn Moss Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use,

subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

MASTER LABEL

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

SUBLABEL A: Household use on Weeds

SUBLABEL B: Household use on Weeds – Hose-end Sprayer

SUBLABEL C: Household use on Moss

SUBLABEL D: Household use on Moss – Hose-end Sprayer

SUBLABEL E: Commercial use on Weeds

SUBLABEL F: Commercial use on Weeds – Hose-end Sprayer

SUBLABEL G: Commercial use on Moss

SUBLABEL H: Commercial use on Moss – Hose-end Sprayer

EPA REG. NO. 67702-

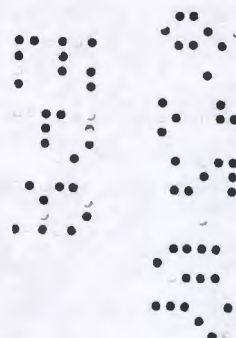
EPA EST. 67702-WG-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
D-31860 Emmerthal, Germany
www.neudorff.com

Household Use: NET CONTENTS: 16 ounces, 24 ounces, 32 ounces, 1 gallon

Commercial Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 10 gallons,
20 gallons, 40 gallons, 45 gallons, 50 gallons, 200 gallons



SUBLABEL A – HOUSEHOLD USE ON WEEDS**NEU1173H Concentrate****Active Ingredient:**

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%****KEEP OUT OF REACH OF CHILDREN****CAUTION**

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Can be used on new lawns (1 week) after grass emergence
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root

-Kills dandelions, down to the root

-(Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture

-(Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds

-People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). **OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL B – HOUSEHOLD USE ON WEEDS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control/suppress broadleaf weeds growing in lawns

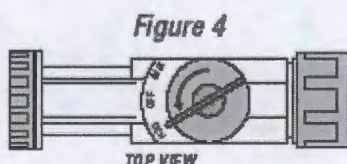
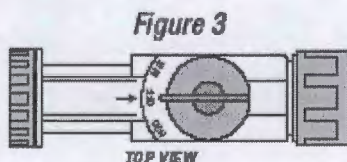
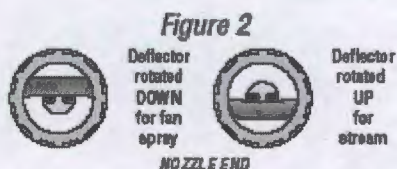
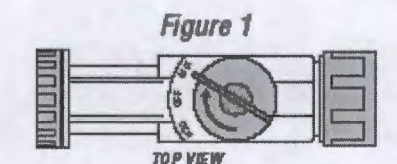
Pests:

Controls or suppresses the following weeds such as but not limited to: Dandelion, English daisy, False dandelion, White clover, Black medic, Bull thistle, Canada thistle, Common chickweed, Creeping buttercup, Persian Speedwell, Slender speedwell, Broadleaf plantain, Narrow-leaved plantain, Dovefoot geranium, Healall, Shepherd's-purse, Silverweed cinquefoil, Wild chamomile, Moss, Liverworts, Algae, Lichens.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

**To Use This Sprayer:**

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

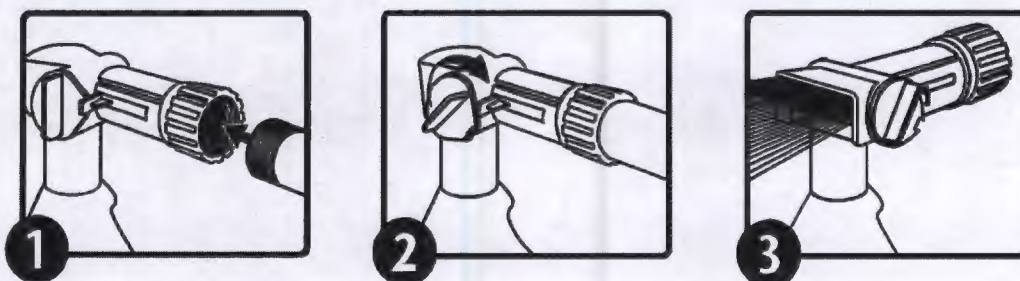
6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

OR

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

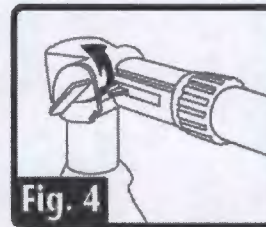
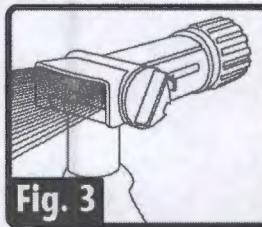
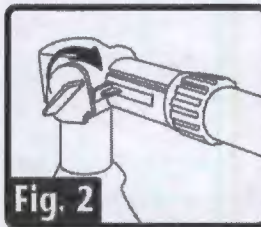
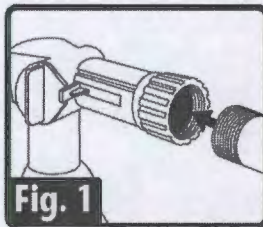
1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



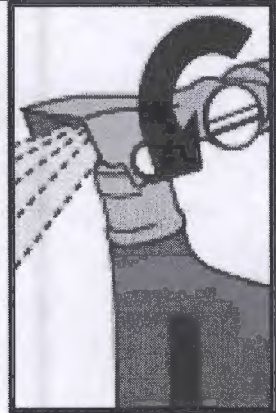


OR

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,

- b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)

- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL C – HOUSEHOLD USE ON MOSS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA)	26.52%
Inert Ingredients:	73.48%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 oz./yard²). Any standard hand-held or backpack sprayer can be used.

Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

Repeat treatment in 3 to 4 weeks for best results.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

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- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not

reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL D – HOUSEHOLD USE ON MOSS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Sites:

Use to selectively control moss, algae, lichens, and liverworts growing in lawns.

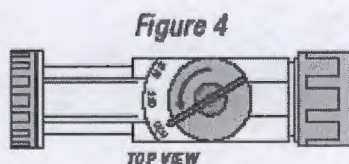
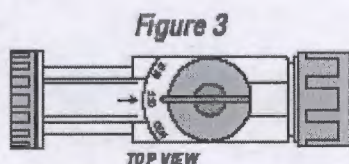
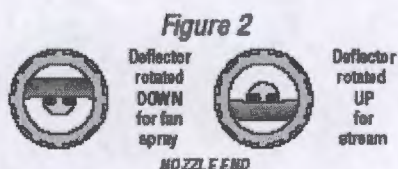
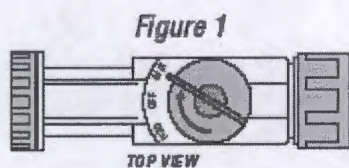
Pests:

Controls moss, algae, lichens, and liverworts.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

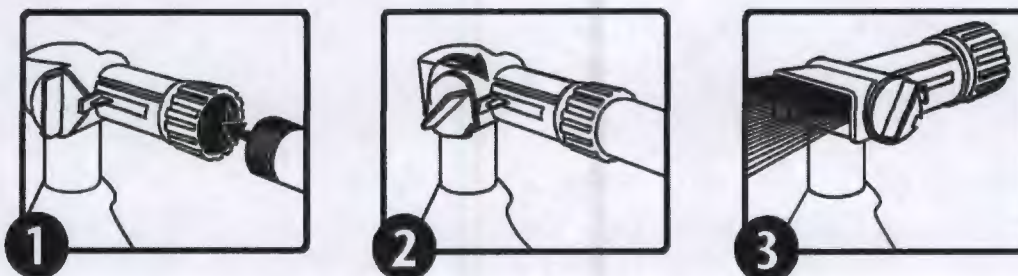
To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

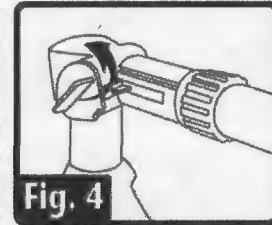
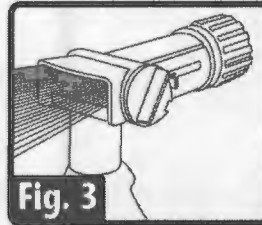
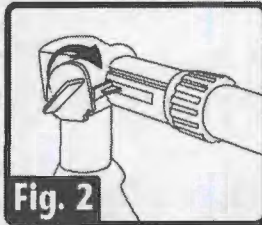
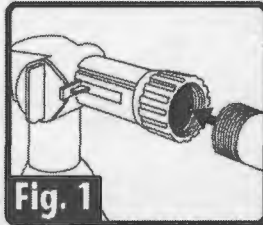


OR

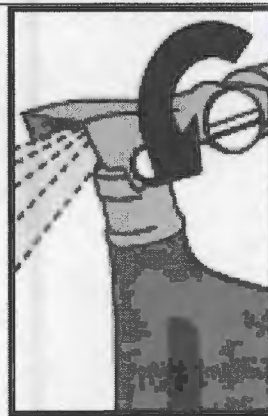
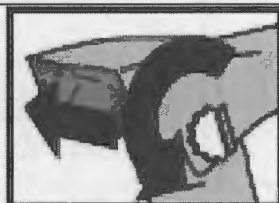
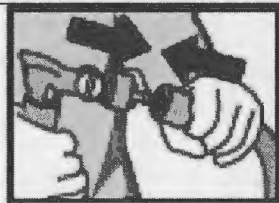
1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

hose, bend the safety tab back and turn dial "ON" until water stops spraying.

7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR



- Ensure that the large Water Control Knob is turned to the "OFF" position.
- Connect sprayer to garden hose.

- Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in.
- Turn on water at faucet.

- To spray, point nozzle where you want to spray and turn the large knob all the way to the left.
- To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet.
- NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again.
- Disconnect garden hose from sprayer.
- To prevent accidental discharge when not in use, turn the small Product Control Button so that it is NOT aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or for disposal instructions. Never place unused product down any indoor or outdoor drain.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based

With the provided hose-end sprayer, this container will treat XXX ft²

NEU1173H

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- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with

applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

SUBLABEL E – COMMERCIAL USE ON WEEDS

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Mix one part [NEU1173H] with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5 fluid oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important.

Repeat treatment in 3 to 4 weeks for best results. For spot treatment of individual weeds, apply to the center of weed.

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- Mix with water
- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [H01 or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly

- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

SUBLABEL F – COMMERCIAL USE ON WEEDS – Hose-end Sprayer

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields

Pests:

Controls or suppresses weeds such as but not limited to:

- Black medic (*Medicago lupulina*)
- Broadleaf plantain (*Plantago major*)
- Bull thistle (*Cirsium vulgare*)
- Canada thistle (*Cirsium arvense*)

- Common chickweed (*Stellaria media*)
- Creeping buttercup (*Ranunculus repens*)
- Dandelion (*Taraxicum officinale*)
- Dovefoot geranium (*Geranium molle*)
- English daisy (*Bellis perennis*)
- False dandelion (*Hypochoeris radicata*)
- Healall (*Prunella vulgaris*)
- Moss, liverworts, algae and lichens
- Narrow-leaved plantain (*Plantago lanceolata*)
- Persian Speedwell (*Veronica persica*)
- Shepherd's-purse (*Capsella bursa-pastoris*)
- Silverweed cinquefoil (*Potentilla anserina*)
- Slender speedwell (*Veronica filiformis*)
- White clover (*Trifolium repens*)
- Wild chamomile (*Matricaria chamomilla*)

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment in 3 to 4 weeks for best results.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:

Figure 1

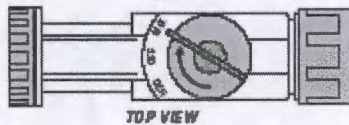


Figure 2

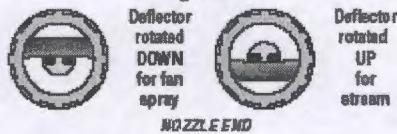


Figure 3

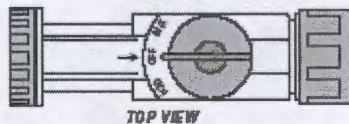
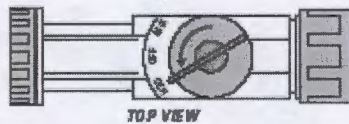


Figure 4



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

6. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
7. Turn off the water from the faucet.
8. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

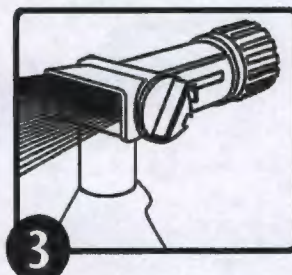
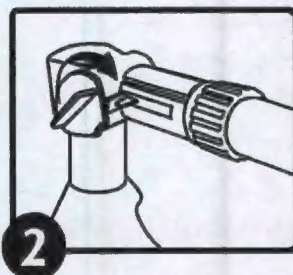
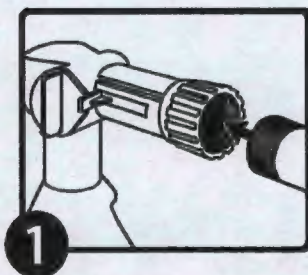
OR

1. Attach garden hose to spray nozzle. Turn on water supply.

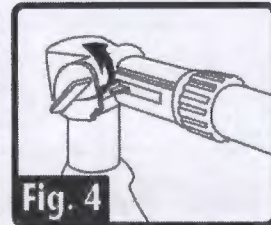
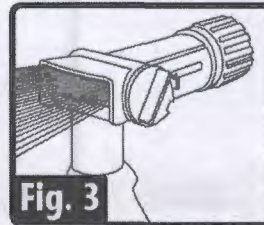
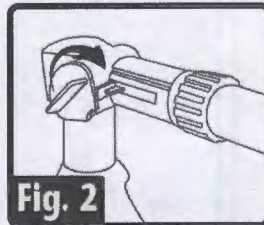
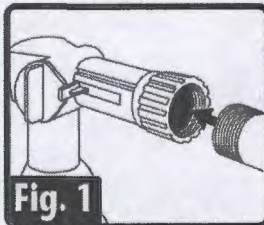
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

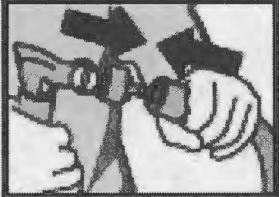


To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H2O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial "ON" until water stops spraying.
7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



		
<ul style="list-style-type: none"> • Ensure that the large Water Control Knob is turned to the "OFF" position. • Connect sprayer to garden hose. 	<ul style="list-style-type: none"> • Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in. • Turn on water at faucet. 	<ul style="list-style-type: none"> • To spray, point nozzle where you want to spray and turn the large knob all the way to the left. • To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet. • NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again. • Disconnect garden hose from sprayer. • To prevent accidental discharge when not in use, turn the small Product Control Button so that it is <u>NOT</u> aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly; dying weeds will be seen within hours of application. Treated weeds, moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do

not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Weed Killer for Lawns
- Selective Weed Killer
- Selective Broadleaf Weed Killer
- Selective Weed Control
- Selective Broadleaf Weed Control
- Selective Control of Weeds in Lawns
- Selective Control of Broadleaf Weeds in Lawns
- Kills weeds not lawns
- Kills weeds not grasses
- Lawn Weed Killer
- Lawn Weed Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective

- No unpleasant odor
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Kills weeds, down to the root
- Kills dandelions, down to the root
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: **100.00%**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes slight eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using.

Mix one part NEU1173H concentrate with 24 parts water (5 oz. in 1 gallon of water). Apply the mixed solution at a rate of 5-10 gallons/1000 ft² (5.75-11.5

oz./yard²). Any standard hand-held or backpack sprayer can be used. Use a coarse nozzle setting to reduce drift. Uniform coverage is important. Repeat treatment if needed.

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns

NEU1173H

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- Kills moss not grasses
- Lawn Moss Killer
- Lawn Moss Control
- Water-based
- When diluted, this bottle will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 5000 ft² (of lawn)
- Can be used to spot treat problem areas
- Can be used to spot treat problem areas in lawns
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- Makes over XX gallons
- 1 ounce = 2 tablespoons = 6 teaspoons
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- People and pets can enter treated area when spray dries]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with

applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NEU1173H Concentrate

Active Ingredient:

Iron HEDTA (FeHEDTA) 26.52%

Inert Ingredients: 73.48%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	-Hold eye open and rinse slowly and gently with water for 15-20 minutes. -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or chewing tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all applicable directions and precautions on this label before using.

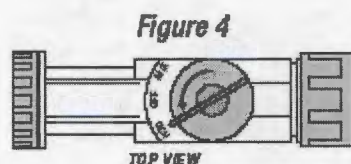
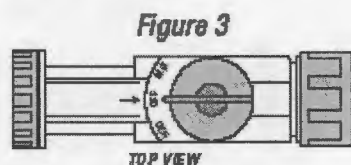
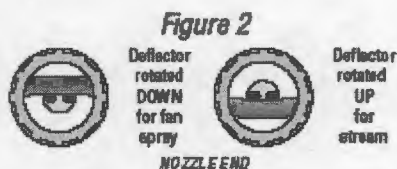
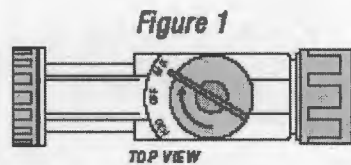
PESTS: Controls moss, algae, lichens, and liverworts growing in lawns and turf.

SITES: Lawns, turf (use on rights of way or non-crop areas), golf courses, parks, playgrounds, cemeteries, athletic fields.

Application Directions

Shake well before using. Apply 1 gallon of concentrate/2500 ft². Uniform coverage is important. Repeat treatment if needed.

[Optional hose-end sprayer directions that may be presented on the container or supplemental wording, either:



To Use This Sprayer:

1. Shake container well.
2. Connect spray nozzle to garden hose.
3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

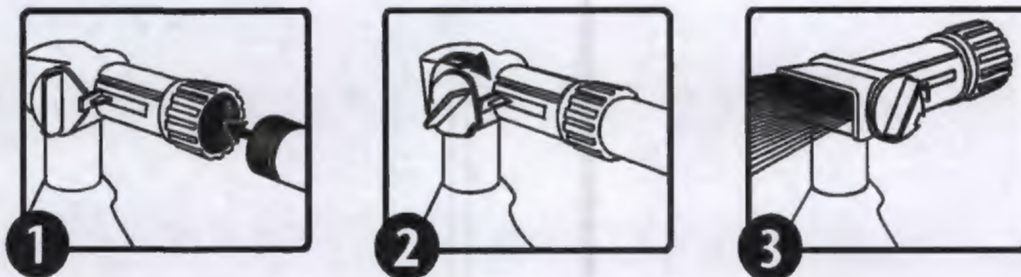
To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)

1. Attach garden hose to spray nozzle. Turn on water supply.
2. Bend safety tab down and turn control to "water".
3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.
2. Turn off the water from the faucet.
3. Turn the blue knob to H₂O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator

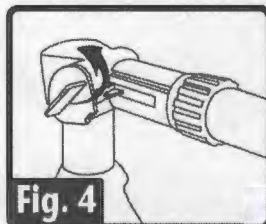
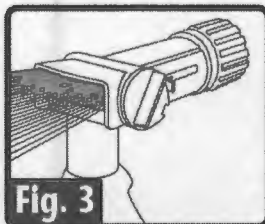
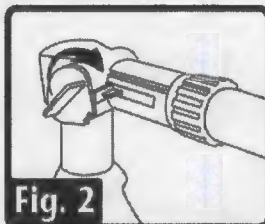
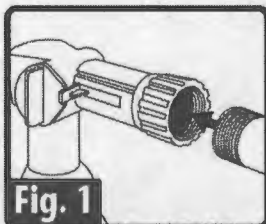


OR

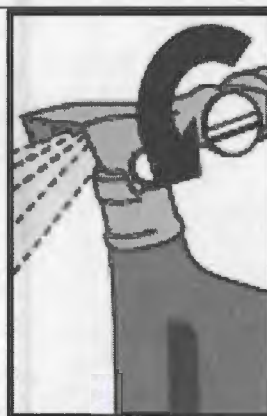
1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the "OFF" position with the safety tab in the valve notch.
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of "ON" until it stops and the safety tab engages the notch on the valve. Turn water off at faucet. To relieve pressure before removing nozzle from

hose, bend the safety tab back and turn dial "ON" until water stops spraying.

7. To STORE unused product, make sure the dial is in the "OFF" position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



OR



- Ensure that the large Water Control Knob is turned to the "OFF" position.
- Connect sprayer to garden hose.

- Turn the small Product Control Button so that the flat side aligns with the tab on the right side of the button, and push the button all the way in.
- Turn on water at faucet.

- To spray, point nozzle where you want to spray and turn the large knob all the way to the left.
- To stop spraying, push small Product Control Button in from opposite side. Turn large Water Control Knob to the right to the "OFF" position and turn off faucet.
- NOTE: BEFORE DISCONNECTING HOSE (to relieve water pressure): Turn large Water Control Knob to the left; then turn "OFF" again.
- Disconnect garden hose from sprayer.
- To prevent accidental discharge when not in use, turn the small Product Control Button so that it is **NOT** aligned with the tab and cannot be pushed in.

]

What will I see?

Works quickly. Treated moss or algae will turn brown or black. Occasionally a darkening of the grass leaf blades can occur after treatment, however the grass will recover within a few days to weeks. May stain thatch (dead grass under lawn); this does not affect the health of the grass.

Use Precautions:

Do not apply to drought stressed grass; ensure lawn is well watered prior to application. Do not apply when the daytime temperature will exceed 85°F. Do not apply to bentgrass. If unsure of grass sensitivity, test spray a small area of your lawn. Do not apply to newly seeded areas prior to grass seed germination. Avoid spraying desirable plants. Avoid spillage when mixing. Any desirable plants or structures accidentally contacted should be rinsed with water. To avoid staining, wait until treated area dries before re-entry. Do not apply if rainfall is expected within 3 hours of application. Do not irrigate within 3 hours of application. Do not apply to the same area more than 4 times a year, not including spot treatments.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. If spilled, use absorbent materials and dispose of in an approved manner.

DISPOSAL

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[The following claims and product information, may or may not be presented on the product's label and labeling:

-www.neudorff.com



- Selective Moss Killer
- Selective Moss Control
- Kills Moss Without Harming Lawn Grasses
- Kills moss not lawns
- Kills moss not grasses
- Lawn Moss Killer

NEU1173H

Page 48 of 49

- Lawn Moss Control
- Water-based
- With the provided hose-end sprayer, this container will treat XXX ft²
- Works in cool weather
- Rainfast in 3 hours
- Works fast
- See results the same day
- See results in hours
- Fast and effective
- No unpleasant odor
- Mix with water
- Does not contain (2,4-D) (MCPA) (Dicamba) (Mecoprop)
- Derived from iron (Fe)
- Iron (Fe) occurs in nature
- For non-selective (moss) weed and grass control, use [NEU1170H or NEU1171H – *insert product name*]
- Eliminates unwanted moss, algae and lichens quickly
- Kills algae, moss and lichens
- Kills moss and algae
- Moss killer
- Moss, algae and lichen killer
- Kills moss fast
- Kills moss, algae, and lichens quickly and effectively
- Lawn areas can be re-sown within one day of treatment with NEU1173H
- (Controls) (kills) (dandelions) (buttercup) (English daisy) (daisy) (clover)
- One gallon of concentrate will treat up to 2500 ft² (of lawn)
- Can be used on new lawns (1 week) after grass emergence
- Even works in cool weather
- Also works in cool weather
- Patent pending
- Patent #6,972,273
- (Helpful Hints:) Best results are obtained when applied in the Spring or Fall when environmental conditions are cool and there is ample moisture
- (Helpful Hints:) The best times to treat weeds are in the Spring when they are small and growing and in the Fall to eliminate many of next year's weeds
- People and pets can enter treated area when spray dries
- Ready-To-Spray
- Hose-End Bottle
- Hose-End Sprayer
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.]

[Optional warranty statements. Registrant has choice of using any or none.

-NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated in the Directions for Use,

subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller. To the extent consistent with applicable law, the Seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.

Or

-Buyer assumes all responsibility for safety and use not in accordance with directions.

Or

-Unconditionally Guaranteed by (company name). OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product, refund your money, or substitute another (brand name) product. Simply send your name, address and proof of purchase to (Company name & address).]

Or

(company name) guarantees if for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

APPLICATION FOR REGISTRATION OF NEU1173H

End-Use Product
USEPA Registration Number 67702-

**CORRESPONDENCE DOCUMENT: EXPLANATIONS AND
WAIVER REQUESTS**

DATA REQUIREMENTS

40 CFR Parts 152 and 158

AUTHOR

Walter G. Talarek

STUDY COMPLETED ON

August 10, 2007

STUDY SUBMITTED BY

W. Neudorff GmbH KG
Postfach 1209
An der Muhle 3
D-31860 Emmerthal, Germany

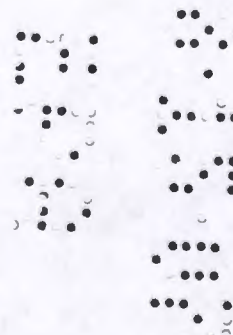
STUDY PERFORMED BY

Walter G. Talarek, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

Eco-Care Technologies, Inc.
8233 Thompson Place
Saanichton, British Columbia V8M 1S1
Canada

STUDY NUMBER

None



**CORRESPONDENCE DOCUMENT: EXPLANATIONS AND
WAIVER REQUESTS**

Product-Specific Data

Product Performance – OPPTS Series 810

Data submitted with application for registration.

Product Chemistry – OPPTS Series 830

Product identity and composition (OPPTS 830.1550)

Data submitted with application for registration.

Description of materials used to produce product (OPPTS 830.1600)

Data submitted with application for registration.

Description of formulation process (OPPTS 830.1650)

Data submitted with application for registration.

Discussion of formation of impurities (OPPTS 830.1670)

Data submitted with application for registration.

Preliminary analysis (OPPTS 830.1700)

Data submitted with application for registration.

Certified limits (OPPTS 830.1750)

Data submitted with application for registration.

Enforcement analytical method (OPPTS 830.1800)

Data submitted with application for registration.

Color (OPPTS 830.6302)

Data submitted with application for registration.

Physical state (OPPTS 830.6303)

Data submitted with application for registration.

Odor (OPPTS 830.6304)

Data submitted with application for registration.

Oxidation/reduction (OPPTS 830.6314)

This requirement is not applicable. The product does not contain either an oxidizing agent or reducing agent.

Flammability (OPPTS 830.6315)

This requirement is not applicable. The product does not contain combustible liquids.

Explosibility (OPPTS 830.6316)

This requirement is not applicable. The product is not potentially explosive.

Storage stability (OPPTS 830.6317)

One-month study submitted with application for registration. Registration requested conditioned upon submitting a full one-year study within one year after the EPA grant of registration.

Miscibility (OPPTS 830.6319)

This requirement is not applicable, because the product is not an emulsifiable liquid that will be diluted with petroleum solvents. However, data submitted with application for registration.

Corrosion characteristics (OPPTS 830.6320)

One-month study submitted with application for registration. Registration requested conditioned upon submitting a full one-year study within one year after the EPA grant of registration.

Dielectric breakdown voltage (OPPTS 830.6321)

This requirement is not applicable. The product will not be used around electrical equipment.

pH (OPPTS 830.7000)

Data submitted with application for registration.

Viscosity (OPPTS 830.7100)

Data submitted with application for registration.

Density/relative density/bulk density (OPPTS 830.7300)

Data submitted with application for registration.

Toxicology – OPPTS Series 870

Acute oral toxicity (OPPTS 870.1100)

Data submitted with application for registration.

Acute dermal toxicity (OPPTS 870.1200)

Data submitted with application for registration.

Acute inhalation toxicity (OPPTS 870.1300)

Data submitted with application for registration.

Acute eye irritation (OPPTS 870.2400)

Data submitted with application for registration.

Acute dermal irritation (OPPTS 870.2500)

Data submitted with application for registration.

Skin sensitization (OPPTS 870.2600)

Data submitted with application for registration.

Generic Data (Iron HEDTA)

Product Chemistry - OPPTS Series 830

Product identity and composition (OPPTS 830.1550)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Description of materials used to produce product (OPPTS 830.1600)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Description of production process (OPPTS 830.1620)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Discussion of formation of impurities (OPPTS 830.1670)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Preliminary analysis (OPPTS 830.1700)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Certified limits (OPPTS 830.1750)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Enforcement analytical method (OPPS 830.1800)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Color (OPPTS 830.6302)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Physical state (OPPTS 830.6303)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Odor (OPPTS 830.6304)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Stability (OPPTS 830.6313)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

pH (OPPTS 830.7000)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Viscosity (OPPTS 830.7100)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Melting point (OPPTS 830.7200)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Density/relative density/bulk density (OPPTS 830.7300)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Dissociation constant (OPPTS 830.7370)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Partition coefficient (OPPTS 830.7550)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Water solubility (OPPTS 830.7840)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Vapor pressure (OPPTS 830.7960)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product.

Fate, Transport and Transformation – OPPTS Series 835

Data submitted with application for registration.

Ecotoxicity – OPPTS Series 850

Aquatic invertebrate acute toxicity (OPPTS 850.1010)

Data submitted with application for registration.

Fish acute toxicity (OPPTS 850.1075)

Data submitted with application for registration.

Avian acute oral toxicity (OPPTS 850.2100)

Data submitted with application for registration.

Avian dietary toxicity (OPPTS 850.2200)

Data submitted with application for registration.

Honey bee acute contact toxicity (OPPTS 850.3020)

Data submitted with application for registration.

Non-target plant studies (Guideline 154.10)

Not applicable. Product will not be used in forests or on natural grasslands. Further, because the product is a selective herbicide, it is intended to be phytotoxic to broadleaf plant species.

Toxicology – OPPTS Series 870

Acute oral toxicity (OPPTS 870.1100)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product. In addition, data developed on the end-use product with the highest concentration of the active ingredient is being submitted with this application for registration.

Acute dermal toxicity (OPPTS 870.1200)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product. In addition, data developed on the end-use product with

the highest concentration of the active ingredient is being submitted with this application for registration.

Acute inhalation toxicity (OPPTS 870.1300)

Waiver requested. Active ingredient produced by an integrated production process, which produces the end-use product. In addition, data developed on the end-use product with the highest percentage of active ingredient is being submitted with this application for registration.

90-day oral toxicity (OPPTS 870.3100)

Not applicable. Use of the product does not require a tolerance, an exemption from the requirement for a tolerance, or a food additive regulation. Use of the product is not likely to result in repeated human exposure by the oral route. Moreover, iron is found abundantly in nature, may be present in foods naturally and as added ingredients, has low toxicity, and has low water solubility, which would decrease its absorption across the intestinal epithelium. Further, MRID 44057801 is being cited in support of this application.

90-day dermal toxicity (OPPTS 870.3250)

Not applicable. Product is not purposefully applied to human skin, and use of the product will not result in prolonged human exposure to the product. Moreover, iron is found abundantly in nature, may be present in foods naturally and as added ingredients, has low toxicity, and has low water solubility, which would decrease its absorption across the intestinal epithelium. Further, MRID 44057801 is being cited in support of this application.

90-day inhalation toxicity (OPPTS 870.3465)

Not applicable. Use of the product will not result in repeated inhalation exposure at a concentration which is likely to be toxic. Moreover, iron is found abundantly in nature, may be present in foods naturally and as added ingredients, has low toxicity, and has low water solubility, which would decrease its absorption across the intestinal epithelium. Further, MRID 44057801 is being cited in support of this application.

Prenatal developmental toxicity (OPPTS 870.3700)

Not applicable. Use of the product will not result in significant exposure to female humans, and use of the product does not require a tolerance, an exemption from the requirement for a tolerance, or a food additive regulation. Moreover, iron is found abundantly in nature, may be present in foods naturally and as added ingredients, has low toxicity, and has a low water solubility, which would decrease its absorption across the intestinal epithelium. Further, MRID 44057801 is being cited in support of this application.

Studies to detect genotoxicity (Guideline 152-17)

Not applicable. Use of the product will not result in significant human exposure. The active ingredient is not structurally related to a known human mutagen, nor does it belong to a chemical class of compounds containing known mutagens. Moreover, iron is found abundantly in nature, may be present in foods naturally and as added ingredients, has low toxicity, and has low water solubility, which would decrease its absorption across the intestinal epithelium. Further, MRID 44057801 is being cited in support of this application.

Immune response (Guideline 152-18)

Waiver requested. Iron HEDTA is not expected to have an effect in humans similar to an effect produced by a naturally-occurring estrogen or other endocrine effects. There is no known metabolite of ferric HEDTA that acts as an endocrine disruptor or an immunotoxicant. Further, MRID 44057801 is being cited in support of this application.



August 7, 2007

Linda Hollis
Chief
Biopesticide and Pollution Prevention Division
c/o Document Processing Desk (APPL))
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460-0001

Re: Authorization of Registration Agent for Neudorff's NEU1173H

Dear Mrs. Hollis:

I hereby authorize Walter G. Talarek, PC as W. Neudorff GmbH KG's ("Neudorff's") agent and representative for the purpose of registering its NEU1173H product containing Iron HEDTA as the active ingredient. This authority includes, without limitation, the authority to sign all documents necessary to effect this purpose and to access all confidential information and files that have been or will be submitted in support of Neudorff's applications for registration.

Sincerely yours,

Cameron Wilson
VP/Operations Manager

